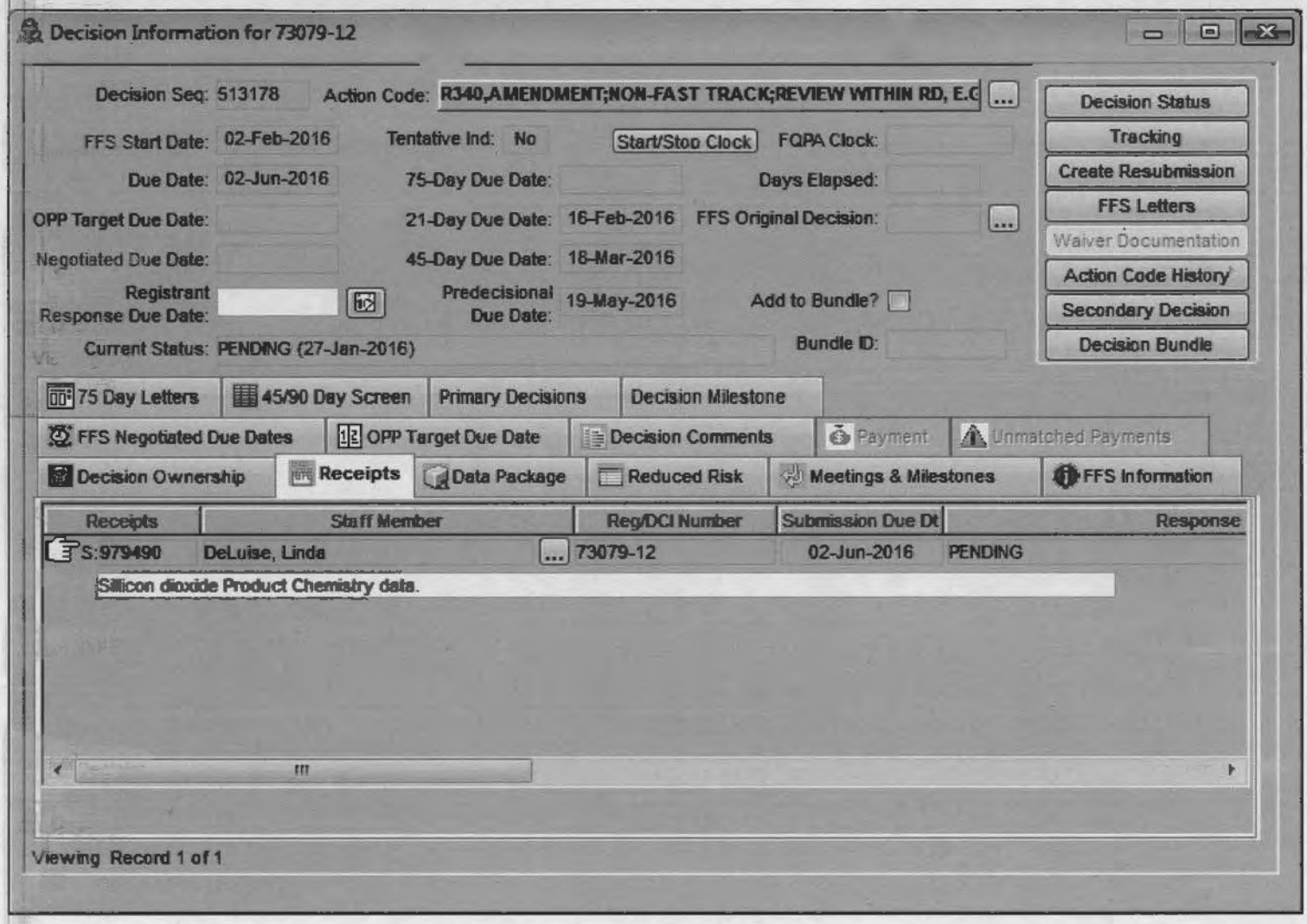
EPA Reg. Jacket 79073-12 vol 1


Decision Information for 73079-12
Decision Seq: 513178
Action Code: R340,AMENDMENT;NON-FAST TRACK;REVIEW WITHIN RD, E.C
FFS Start Date: 02-Feb-2016
Tentative Ind: No
Start/Stop Clock
FQPA Clock:
Due Date: 02-Jun-2016
75-Day Due Date:
Days Elapsed:
OPP Target Due Date:
21-Day Due Date: 16-Feb-2016
FFS Original Decision:
Negotiated Due Date:
45-Day Due Date: 18-Mar-2016
Registrant Response Due Date:
Predecisional Due Date: 19-May-2016
Add to Bundle?
Current Status: PENDING (27-Jan-2016)
Bundle ID:
Decision Status
Tracking
Create Resubmission
FFS Letters
Waiver Documentation
Action Code History
Secondary Decision
Decision Bundle
75 Day Letters
45/90 Day Screen
Primary Decisions
Decision Milestone
FFS Negotiated Due Dates
OPP Target Due Date
Decision Comments
Payment
Unmatched Payments
Decision Ownership
Receipts
Data Package
Reduced Risk
Meetings & Milestones
FFS Information
Receipts
Staff Member
Reg/DCI Number
Submission Due Dt
Response
S:979490
DeLuise, Linda
73079-12
02-Jun-2016
PENDING
Silicon dioxide Product Chemistry data.
Viewing Record 1 of 1

Rockwell Labs Ltd
creating the future of pest control

April 9, 2016

Registration Division, I&VB 2, PM 10
Document Processing Desk (AMEND)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attn: Mr. Richard Gebken/Ms. Linda DeLuise

Re: Silicide™, EPA Reg. No. 73079-12
Response to Agency Letter Dated April 6, 2016 regarding Preliminary Technical Screen Deficiency
Amendment with Product Chemistry Submission

Dear Mr. Gebken/Ms. DeLuise:

In response to the above-noted correspondence, enclosed please find the following for the subject product:

-Revised CSF
-Revised Label with highlights

The only change to the revised label from the previously submitted version is in the ingredient statement which has been revised to reflect Agency comments in the above-mentioned letter. The CSF has also been revised to reflect Agency comments in the above-mentioned letter.

Thanks for your attention. If you have any other questions or concerns, feel free to contact us at 816 283 3167 or cspragins@rockwelllabs.com. We look forward to a favorable and expeditious review.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

Rockwell Labs Ltd
creating the future of pest control

April 9, 2016

Registration Division, I&VB 2, PM 10
Document Processing Desk (AMEND)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attn: Mr. Richard Gebken/Ms. Linda DeLuise

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Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

SiliCide™

ABN: CimeXa™ Insecticide Dust
ABN: Maggie's Farm™ Simply Effective™ Bed Bug Killer

Active Ingredient: Silicon Dioxide as Amorphous Silica	92.1%
Other Ingredients	7.9%
Total:	100.0%

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 3 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and other manmade structures, and food handling and food processing establishments.

General Information: SiliCide™ is a desiccant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A craft or paint brush is useful for pushing dust into cracks and crevices, and into tufts and folds of mattresses and cushions. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine up to 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of product/water slurry per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind and visible after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring.

Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Stored Product (Pantry and Fabric/Clothes) Beetles and Moths: Treat cracks, crevices and along the edges of cupboards, closets, pantries, shelving units and storage. Treat voids beneath drawer units by removing the lower drawers and treating the well. Treat the voids beneath shelving units or cabinets by removing the kickplate or drilling small access holes in the kickplate. Treat under rugs and along the edges of carpets and baseboards and other infested areas to control carpet beetles.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply in serving areas when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

Manufactured by: Rockwell Labs Ltd [logo]
1257 Bedford Ave
[North] Kansas City, MO 64116
[Phone number] [www.rockwelllabs.com/www.maggiesfarmproducts.com]

[© XXXX] [Trademark(s) ownership statement]
[Green Zone is not a third party certification.] ***Used when Green Zone Brand logo is used.***

Marketing Claims

[Dust] For Control of/Kills: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, Stored Product/Pantry/Fabric/Clothes Beetles and Moths and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

[WBE Woman Business Enterprise NWBOC Certified (logo)] ***As factual based on company certification***
[Green Zone Brand [(logo)]]
Logo options depicted below in grayscale – may be colorized in actual use

Confidential Statement of Formula may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 5, 2016

OPP Decision Numbers: 513178
EPA File Symbols: 73079-12
Product Names: Silicide™
EPA Receipt Date: January 7, 2016
EPA Company Number: 73079-12
Company Name: Rockwell Labs Ltd

Ms. Cisse W. Spragins, PhD
Rockwell Labs Ltd
1257 Bedford Avenue
North Kansas City, MO 64116

Dear Dr. Spragins:

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA) Act, as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected.

The Chemistry, Inserts and Toxicology Assessment Branch has completed its screening of your proposed product Silicide™ and have cited the following deficiencies:

1. The nominal concentration of (90%) for the active ingredient on the basic Confidential Statement of Formula (CSF) dated December 31, 2015 does not concur with the nominal concentration of the active ingredient (92.078%) as determined by the 5 batch analysis. Though 92.07% falls within the certified limits of 90.0%, you must clarify this discrepancy. The basic CSF nominal concentration of the active ingredient must concur with the product label claim nominal concentration of the active ingredient. The nominal concentration of the active ingredient must be revised so that it concurs with the nominal concentration as determined by the five batch analysis.

In order for the review of your product to continue, you will need to correct your application to address the item(s) listed above within 10 business days of the date you received this letter. Corrections must be received by EPA by the 10th business day. EPA recommends sending your complete set of corrections by email to the contact listed below to ensure they are timely received. If studies or confidential information are being submitted by mail, a complete courtesy

copy received by email by the deadline will be considered timely. If you cannot correct the application [or do not respond] within 10 business days, your application will be rejected.

At this time you could also choose to withdraw your application. If you have any questions, please contact Linda A. DeLuise by phone at 703-305-5428, or via email at deluise.linda@epa.gov.

Sincerely,

for

Susan Lewis
Division Director
Registration Division (7505P)
Office of Pesticide Programs

DeLuise, Linda

From: Cisse Spragins <cspragins@rockwelllabs.com>
Sent: Wednesday, April 06, 2016 9:04 AM
To: DeLuise, Linda
Subject: Re: 73079-12 10 day letter

Thanks, Linda. We will get this taken care of shortly.

Sent from Outlook Mobile. Yes, it works with Gmail.

On Wed, Apr 6, 2016 at 6:00 AM -0700, "DeLuise, Linda" <DeLuise.Linda@epa.gov> wrote:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: D432485; **FILE SYMBOL No.**: 73079-12(screen); **PRODUCT NAME**: Silicide ™; **DECISION No.**:513178; **PC Code(s)**: 072605; **ACTION CODE**: R340; **FOOD Use**: No

DATE OUT: March 31, 2016

SUBJECT: 45/90 day screen results for end use product "Silicide ™"

FROM: Shyam Mathur, Product Chemistry Team Leader, CITAB / RD (7505P)

TO: Linda DeLuise / Richard Gebken, RM 10; I-V Branch 2 / RD (7505P)

Company Name: Rockwell Labs Ltd.
Active Ingredient(s): Silicone dioxide as Amorphous Silica (90%)
MRID No(s).: 49807801 and 49807802

CONCLUSION:

Deficiencies: Yes
(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc)

Group A: All data submitted (source of the AI is unregistered)

Group B: All data submitted.

CSF: Basic CSF (dated 12-31-2015) submitted
Note 1: The nominal concentration of the (90%) does not concur with the nominal concentration of the AI (92.078%) as determined by 5 batch analysis. Though 92.07% will fall within the certified limits of 90.0%.The registrant must clarify this discrepancy. It is preferred that basic CSF nominal concentration of AI concurs with the product label claim nominal concentration of AI.

DRAFT PRODUCT LABEL: Submitted
Note to PM: The NC of the AI must be revised so that it concurs with the NC as determined by five batch analysis.

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to the author of this report the corrected deficiencies in response to 10 day letter. The corrected deficiencies will be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.

DeLuise, Linda

From: postmaster@rockwelllabs.com
To: Cisse Spragins
Sent: Wednesday, April 06, 2016 9:00 AM
Subject: Delivered: 73079-12 10 day letter

Your message has been delivered to the following recipients:

Cisse Spragins (cspragins@rockwelllabs.com)

Subject: 73079-12 10 day letter

73079-12

Memorandum

Date: 2 / 2 / 16

To: PM 10, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:
- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 2/2/16	EPA Reg No./File Symbol 73079-12	Page - of 1
Applicant's/Registrant's Name & Address Rockwell Labs Ltd, 1257 Bedford Ave, North Kansas City, MO 64116	Product SiliCide(TM)	

Ingredient Silicon Dioxide as Amorphous Silica

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Series 830	Product Chemistry Group A	not assigned	Rockwell Labs Ltd	own	
Series 830	Product Chemistry Group B	not assigned	Rockwell Labs Ltd	own	
870.1100	Acute Oral Toxicity in Rats	44613704	Home Saving Termite Control	old	
870.1200	Acute Dermal Toxicity in Rats	44613705	Home Saving Termite Control	old	
870.2400	Primary Eye Irritation in Rabbits	44613707	Home Saving Termite Control	old	
870.2500	Primary Skin Irritation in Rabbits	44613708	Home Saving Termite Control	old	
870.1300	Acute Inhalation Toxicity in Rabbits	44613706	Home Saving Termite Control	old	
870.2600	Dermal Sensitization in Guinea Pigs	44613709	Home Saving Termite Control	old	
Series 810	Product Performance / Efficacy	48347401	Rockwell Labs Ltd	own	
Series 810	Product Performance / Efficacy	44613703	Home Saving Termite Control	old	

Signature	Name and Title Cisse W. Spragins, PhD, CEO	Date 2/2/16

EPA Form 8570-35 (12-2003) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 1-7-16

Experts In-Processing Signature: B.B. Date 1-28-16 Fee Paid: Yes ✓

Division management contacted on issues No_____ Yes_____ Date_____

EPA Reg. Number: 73079-12	EPA Receipt Date: 1-7-16

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) No inerts to review	yes	no			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	**Data Matrix** (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
		yes	no			
	a) Selective Method (Fee category experts use)	X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (Electronic labels on CD are encouraged and guidance is available)**			X		
7	**Is the data package consistent with PR Notice 86-5**			X		
8	**Notice of Filing included with petitions**					X

9	**If applicable for conventional applications, <u>reduced risk rationale</u>**			X
10	**<u>Required Data</u> and/or data waivers. See Footnote C.**			
	a) List study (or studies) not included with application			

Comments:

* Documentation: (Pass) / Fail
- no Certification with Respect to Citation of Data form
- no Data Matrix
- contacted the Submitter on 2-2-16
- received the documents on 2-2-16
- required forms are complete

* Inerts: (Pass) / Fail
- no inerts to review

APRN 11-3: (Pass) / Fail
MRID: 498078

JK 2-3-16

* Overall Status: (Pass) / Fail

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or

3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Kang, Ji Yeon

From: Cisse Spragins <cspragins@rockwelllabs.com>
Sent: Tuesday, February 02, 2016 4:09 PM
To: Kang, Ji Yeon
Subject: RE: Submission to EPA: SiliCide™ (EPA Reg. No. 73079-12)
Attachments: Silicide 73079-12 Cert Cite Data and Data Matrix forms 2-2-16.pdf

Ms. Kang – Attached are the requested forms. Please advise if you need anything else.

Thanks.

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd
816-283-3167

This electronic mail transmission, including any attachments, may contain confidential information of Rockwell Labs Ltd. It is intended only for the person(s) named, and the information in such e-mail shall only be used by the person(s) named for the purpose intended and for no other purpose. Any use, distribution, copying, or disclosure by any other persons, or by the person(s) named but for purposes other than the intended purpose, is strictly prohibited. If you received this transmission in error, please notify the sender by reply e-mail and then destroy this e-mail.

From: Kang, Ji Yeon [mailto:Kang.Joyce@epa.gov]
Sent: Tuesday, February 02, 2016 6:24 AM
To: Cisse Spragins
Cc: Ashe, Anthony
Subject: Submission to EPA: SiliCide™ (EPA Reg. No. 73079-12)

Dear Ms. Spragins,

My name is Joyce Kang and I am a contractor with the EPA. I am contacting you in regards to your submissions in support of the product SiliCide™ (EPA Reg. No. 73079-12). We have found few deficiencies with the submissions that will need to be addressed:

1. Please submit the Certification with Respect to Citation of Data form (EPA Form 8570-34).
2. Please submit the Data Matrices (EPA form 8570-35).

Please send the necessary document before Feb 11th so that we may further process your submission. After Feb 11th, please direct all correspondence/corrections to the appropriate EPA Risk Manager. If you have any questions, please do not hesitate to contact me.

Best,

Joyce Kang

Contractor, US EPA
2777 S. Crystral Drive, S-4822
Arlington, VA 22202
(703) 347-0416
Email: kang.joyce@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 27, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-513178
EPA File Symbol or Registration Number: 73079-12
Product Name: SILICIDE(TM)
EPA Receipt Date: 07-Jan-2016
EPA Company Number: 73079
Company Name: ROCKWELL LABS LTD

CISSE W. SPRAGINS, PH.D.
ROCKWELL LABS LTD
D/B/A MAGGIE'S FARM LTD
1257 BEDFORD AVENUE
NORTH KANSAS CITY, MO 64116-

SUBJECT: Receipt of Amendment and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your amendment, 75% small business waiver request, and certification of payment. If you submitted data with this action, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

AMENDMENT;NON-FAST TRACK;REVIEW WITHIN RD, E.G. PRECAUTIONARY LABELING;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,
Teresa Downs
Front End Processing Staff
Information Technology & Resources Management Division

Pay.gov

Receipt

Your payment is complete

Pay.gov Tracking ID: 25PITVLN
Agency Tracking ID: 74946933372
Form Name: Pesticide Registration Improvement Act - Prepayment
Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: $997.00
Transaction Date: 01/25/2016 02:09:37 PM EST
Payment Date: 01/26/2016
Registration Number: 73079-12
Company Name: Rockwell Labs Ltd
Company Number: 73079
Action Code: R340

Account Information

Account Holder Name: Rockwell Labs Ltd
Routing Number: 101000035
Account Number: **********6184

Email Confirmation Receipt

Confirmation Receipts have been emailed to:
cspragins@rockwelllabs.com

Downs, Teresa

From: Cisse Spragins <cspragins@rockwelllabs.com>
Sent: Monday, January 25, 2016 2:23 PM
To: Downs, Teresa
Subject: RE: Response required by 1/25/16: proof of PRIA fee payment required for application to amend EPA registration number 73079-12 (SILICIDE)
Attachments: 73079-12 PRIA fee recepit and smbus waiver 1-25-16.pdf

Ms Downs – Attached please find our pay.gov receipt for the PRIA payment for the subject action, as well as our small business waiver request and supporting documentation. Please let me know if you have any questions or concerns. Thanks.

Cisse

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd
816-283-3167

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From: Downs, Teresa [mailto:Downs.Teresa@epa.gov]
Sent: Wednesday, January 13, 2016 1:10 PM
To: Cisse Spragins
Cc: Schaible, Stephen
Subject: Response required by 1/25/16: proof of PRIA fee payment required for application to amend EPA registration number 73079-12 (SILICIDE)

Dear Dr. Spragins:

The Registration Division's PRIA team has determined that the above action is subject to PRIA action code R340. The fee for this action code is **$3,988**. Please email me a pay.gov receipt or electronic transfer ID for this amount as proof of fee payment.

Section 33(B)(2(D) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended by the Pesticide Registration Improvement Renewal Act, provides that the fee is due upon submission of the application. We received this action on 01/07/16. If proof of fee payment is not received by COB on 01/25/16, then we will reject this action for non-payment of the PRIA fee and send you an invoice for $997 (25% of the PRIA fee). The Agency is required to collect a minimum of 25% of the applicable fee even if an application is rejected. If you do not pay the invoice by the date specified therein, then the fees will be treated as a claim of the United States Government subject to subchapter II of chapter 37 of title 31, United States Code.

If you have questions about the assignment of the above action code, please contact Steve Schaible at (703)308-9362 or Schaible.stephen@epa.gov.

Sincerely,

Teresa Downs
Office of Pesticide Programs
U.S. Environmental Protection Agency

phone: (703)305-5363
downs.teresa@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 22, 2016

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

ROCKWELL LABS LTD
1257 BEDFORD AVENUE
NORTH KANSAS CITY, MO 64116

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 07-JAN-16. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Fee for Service

{979490C~

This package includes the following

- ○ New Registration
- ◉ Amendment

☑ Studies? ☑ Fee Waiver?

☐ volpay % Reduction: 75

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 10

Receipt No. S-	979490
EPA File Symbol/Reg. No.	73079-12
Pin-Punch Date:	1/7/2016

☐ This item is NOT subject to FFS action.

Action Code:

Requested: ?

Granted: R340

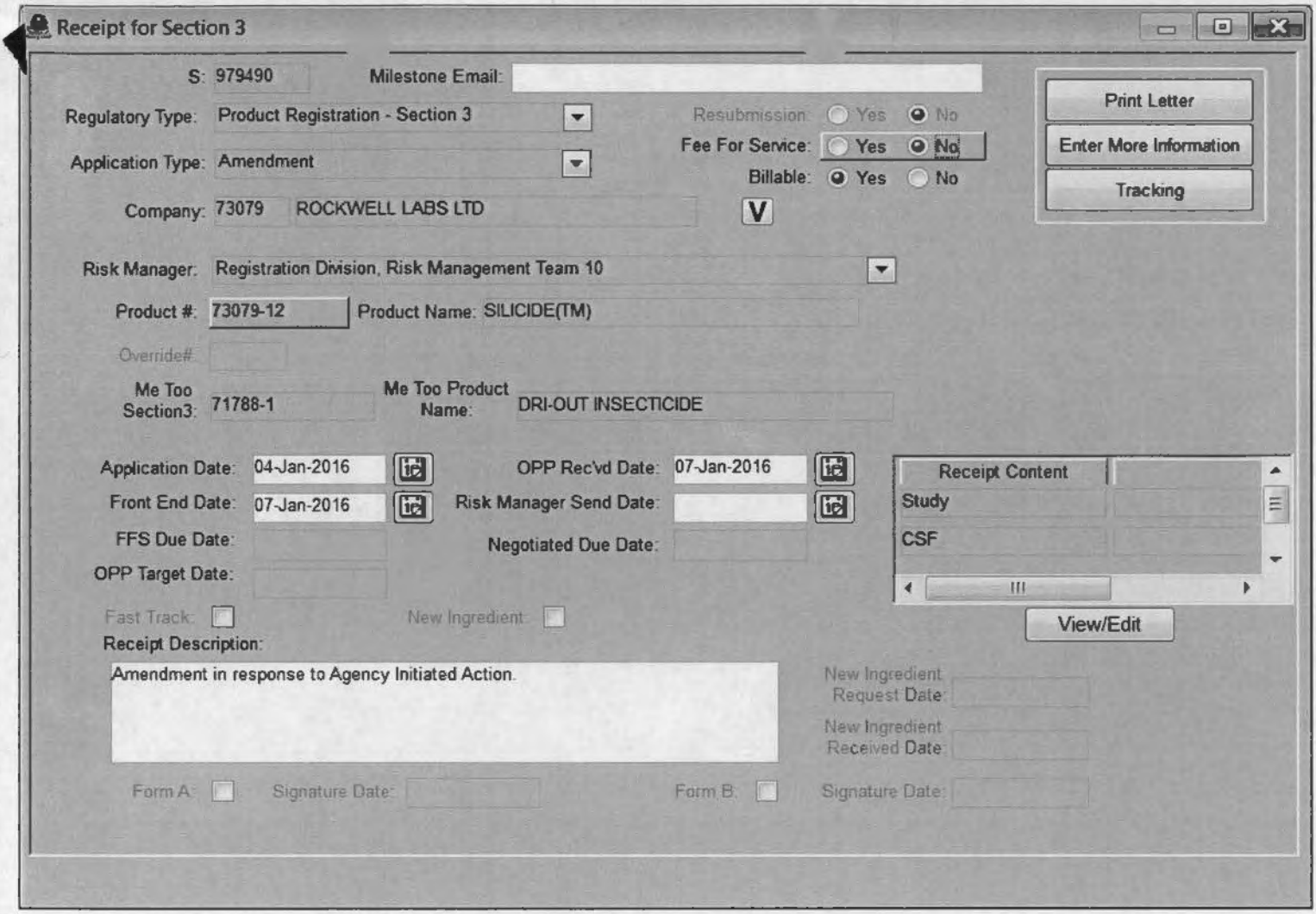
Amount Due: $3,988.00

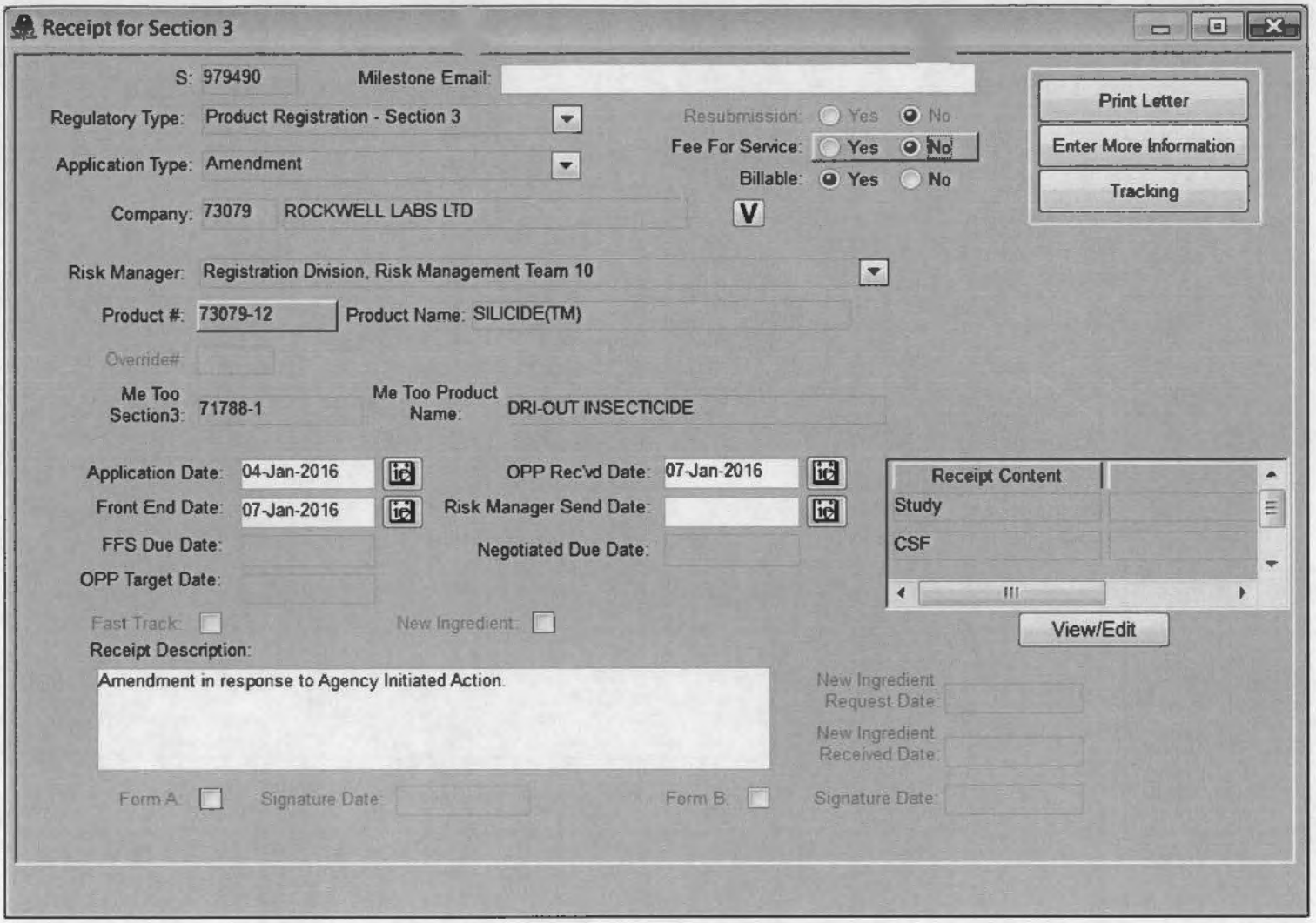
Parent/Child Decisions:

☐ Inert Cleared for Intended Use ☐ Uncleared Inert in Product

Reviewer: [signature] Date: 1/11/16

Remarks:


Receipt for Section 3
S: 979490
Milestone Email:
Regulatory Type: Product Registration - Section 3
Application Type: Amendment
Company: 73079 ROCKWELL LABS LTD
Resubmission: Yes No
Fee For Service: Yes No
Billable: Yes No
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 10
Product #: 73079-12
Product Name: SILICIDE(TM)
Override#:
Me Too Section3: 71788-1
Me Too Product Name: DRI-OUT INSECTICIDE
Application Date: 04-Jan-2016
Front End Date: 07-Jan-2016
FFS Due Date:
OPP Target Date:
OPP Rec'vd Date: 07-Jan-2016
Risk Manager Send Date:
Negotiated Due Date:
Receipt Content
Study
CSF
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Amendment in response to Agency Initiated Action.
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:


Receipt for Section 3
S: 979490
Milestone Email:
Regulatory Type: Product Registration - Section 3
Application Type: Amendment
Company: 73079 ROCKWELL LABS LTD
Resubmission: Yes No
Fee For Service: Yes No
Billable: Yes No
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 10
Product #: 73079-12
Product Name: SILICIDE(TM)
Override#:
Me Too Section3: 71788-1
Me Too Product Name: DRI-OUT INSECTICIDE
Application Date: 04-Jan-2016
Front End Date: 07-Jan-2016
FFS Due Date:
OPP Target Date:
OPP Rec'vd Date: 07-Jan-2016
Risk Manager Send Date:
Negotiated Due Date:
Receipt Content
Study
CSF
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Amendment in response to Agency Initiated Action.
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

TRANSMITTAL DOCUMENT

Name and Address of Submitter: Rockwell Labs Ltd
1257 Bedford Ave
North Kansas City, MO 64116 USA

Regulatory Action in Support of Which This Package is Submitted:

Amendment of SiliCide™
EPA Reg. No.: 73079-12

Transmittal Date: 4 January 2016
By Federal Express

List of Submitted Studies:

Volume 1: Product Chemistry Group A
Silicide – 90% Silicon Dioxide
RLL/0915/C020

Volume 2: Product Chemistry Group B
Silicide – 90% Silicon Dioxide
RLL/0915/C020

Company Official: Cisse W. Spragins, Ph.D.

Signature

Company Name: Rockwell Labs Ltd

Company Contact: Cisse W. Spragins, Ph.D. tel: 816 283 3167

Rockwell Labs Ltd
creating the future of pest control

49807800

January 4, 2016

Registration Division, I&VB 2, PM 10
Document Processing Desk (AMEND)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

Attn: Mr. Richard Gebken/Ms. Linda DeLuise

Re: Silicide™, EPA Reg. No. 73079-12
Response to Agency Initiated Action Dated July 29, 2015 and Letter Dated Sept 17, 2015 and Email Correspondence of Sept 23, 2015
Non-PRIA Amendment

Dear Mr. Gebken/Ms. DeLuise:

In response to the above-noted correspondence, enclosed please find the following for the subject product:
-Application Form
-Group A and Group B Product Chemistry (3 copies)
-Revised Label with highlights
-Revised CSF

The only change to the revised label from the previously submitted version is in the ingredient statement which has been revised to reflect the results of the Product Chemistry study. The CSF has also been revised to reflect the results of the Product Chemistry study. The label change is noted on the enclosed highlighted copy of the label, which has also been sent electronically to Ms. DeLuise per her request.

The Product Chemistry for this product is a bit confusing from a regulatory standpoint, so I wanted to discuss how we complied with the Agency's requests. We purchase amorphous silica in bulk from the manufacturer and pack into the final containers for selling our registered end-use product, without any further processing, or adding any other ingredients. There is no technical or manufacturing use registration for the active, and per the RED, such is not required.

The Agency asked us to list impurities on the CSF, which is typically the way CSFs are done for technical or manufacturing use products, versus end-use products which would list the actives and intentionally added inerts. Since there is no manufacturing use product registration, we decided to go ahead and perform the Product Chemistry as if the product was a manufacturing use product and complete a five batch analysis of purity and impurities, using five distinct lots from the silica product manufacturer. The Product Chemistry submitted reflects that decision on our part. This did cause the time required to complete the Product Chemistry to be longer than it would have been for a typical end-use product.

I also wanted to comment on the CAS No. used. There are many CAS Nos. for various types of silica, natural and manufactured, which can be confusing. We found the attached document helpful. The document is Page 10 from a report by the European Center for Ecotoxicology and Toxicology of Chemicals, Joint Assessment of Commodity Chemicals #51 – Synthetic Amorphous Silica. The chart shows the general overall CAS No. for Silica is 7631-86-9. Various specific types of silica have different, more specific CAS Nos. as noted in the chart. Synthetic amorphous silica manufactured by a [redacted] is designated by CAS No. 112926-00-8. That is the CAS No. we use for our product (and the one we have used all along) as it describes our product most specifically.

Thanks for your kind attention. We have done our best to comply with the Agency's requests as completely and specifically as possible. If you would like anything formatted or presented differently, or have any other questions or concerns, feel free to contact us at 816 283 3167 or cspragins@rockwelllabs.com. We look forward to a favorable and expeditious review.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

Manufacturing process information may be entitled to confidential treatment

TRANSMITTAL DOCUMENT

Name and Address of Submitter: Rockwell Labs Ltd
1257 Bedford Ave
North Kansas City, MO 64116 USA

Regulatory Action in Support of Which This Package is Submitted:

Amendment of SiliCide™
EPA Reg. No.: 73079-12

Transmittal Date: 4 January 2016
By Federal Express

List of Submitted Studies:

49807801 Volume 1: Product Chemistry Group A
Silicide – 90% Silicon Dioxide
RLL/0915/C020

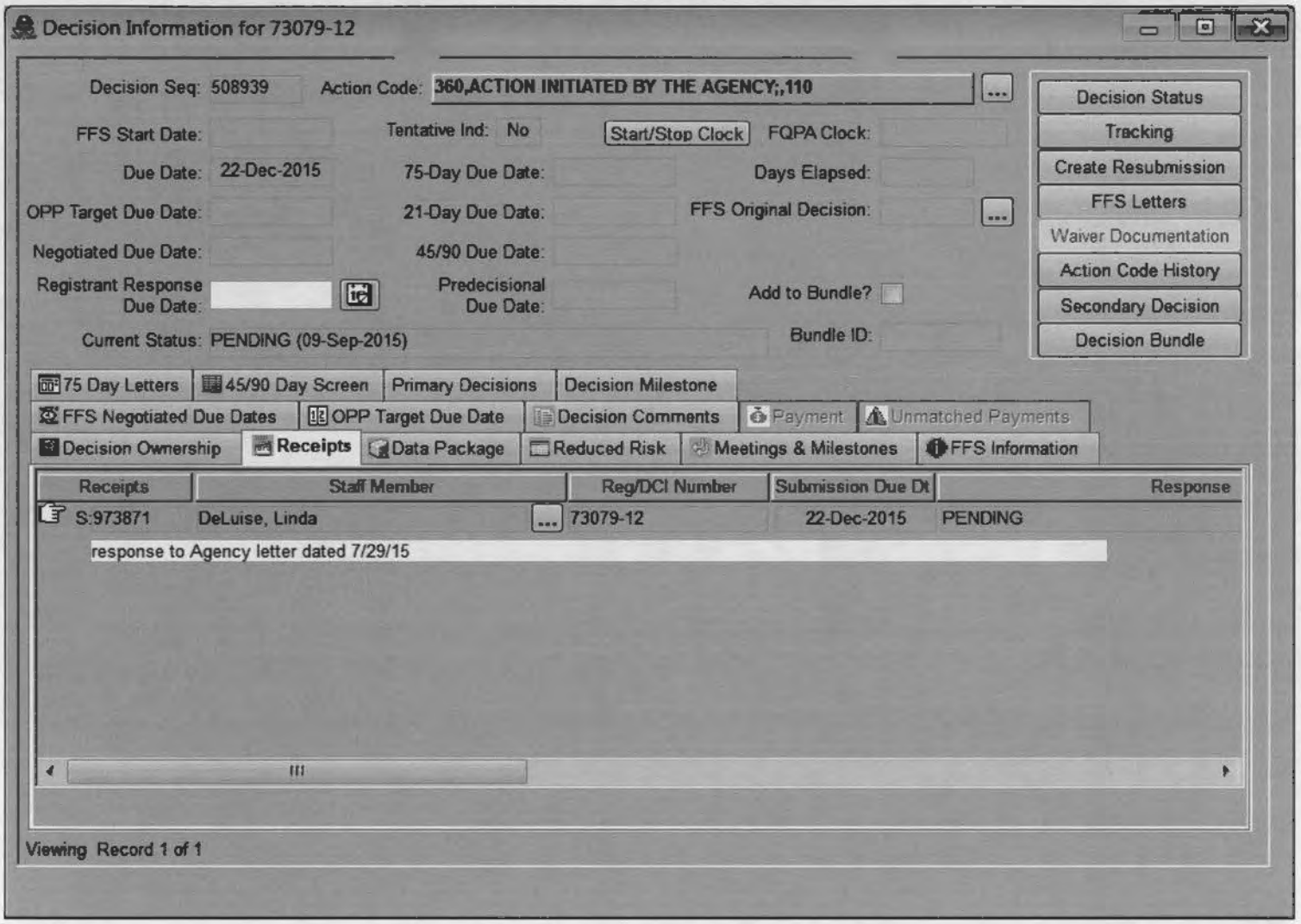
49807802 Volume 2: Product Chemistry Group B
Silicide – 90% Silicon Dioxide
RLL/0915/C020

Company Official: Cisse W. Spragins, Ph.D. _____
Signature

Company Name: Rockwell Labs Ltd

Company Contact: Cisse W. Spragins, Ph.D. tel: 816 283 3167

Administrative Materials


Decision Information for 73079-12
Decision Seq: 508939
Action Code: 360,ACTION INITIATED BY THE AGENCY;,110
FFS Start Date:
Tentative Ind: No
Start/Stop Clock
FQPA Clock:
Due Date: 22-Dec-2015
75-Day Due Date:
Days Elapsed:
OPP Target Due Date:
21-Day Due Date:
FFS Original Decision:
Negotiated Due Date:
45/90 Due Date:
Registrant Response Due Date:
Predecisional Due Date:
Add to Bundle?
Current Status: PENDING (09-Sep-2015)
Bundle ID:
Decision Status
Tracking
Create Resubmission
FFS Letters
Waiver Documentation
Action Code History
Secondary Decision
Decision Bundle
75 Day Letters
45/90 Day Screen
Primary Decisions
Decision Milestone
FFS Negotiated Due Dates
OPP Target Due Date
Decision Comments
Payment
Unmatched Payments
Decision Ownership
Receipts
Data Package
Reduced Risk
Meetings & Milestones
FFS Information
Receipts
Staff Member
Reg/DCI Number
Submission Due Dt
Response
S:973871
DeLuise, Linda
73079-12
22-Dec-2015
PENDING
response to Agency letter dated 7/29/15
Viewing Record 1 of 1

DeLuise, Linda

From: Cisse Spragins <cspragins@rockwelllabs.com>
Sent: Wednesday, September 23, 2015 1:41 PM
To: DeLuise, Linda
Subject: RE: Agency Initiated Action Dated July 29, 2015 Reg. No. 73079-12 Silicide
Attachments: 73079-4-20140806 stamped.pdf; 73079-6-20140807 stamped.pdf; CimeXa PCT article.pdf

Re: Your Letter dated Sept 17, 2015

Hi Linda – Per your letter and our 'phone conversation, I wanted to respond to the various issues in your letter. I'll refer to the issues by the same numbers as in your letter:

1. Product Chemistry – as discussed, we cited an existing MRID # without any knowledge that this data had presumably never been accepted by the Agency. We are happy to generate the data but will need some time to do it. Given the nature of silica (silicon dioxide), we don't have the capability to do Group analysis in-house, as you can't use the normal HPLC or titration methods as we do for our other actives. So we will have to contract that portion out, or coordinate with our supplier [redacted] to see if they can do it in-house. We are communicating with [redacted] to see how best to proceed, but I expect we'll need at least 90 days to get it done, given that we can't do it all in-house, so we'd appreciate an extension to at least 90 days. Thanks.

2., 3., 6. And 8. As we discussed on the phone, the "Maggie's Farm Simply Effective" names, trademark statements and logos were reviewed by the Agency *ad nauseum* last year and accepted (Aug 2014) on several of our products. Per your request, I have attached the stamped labels for two of these products as examples, which both have the exact same label elements we are seeking for this product label. Stamped labels attached for 73079-4 and 73079-6. These labels and several others we have also contain the phrase "and other manmade structures" as part of the use site description.

4. There is no reason that a paint or craft brush should not be an acceptable application tool for this product. It is a great way to apply it to certain areas as noted and helps to better contain the powder, and keep it from floating into the air the way it can with a duster. This application technique emerged from some independent efficacy testing performed by Dr. Mike Potter at the University of Kentucky (which showed extremely impressive results versus bed bugs, compared to typical synthetic sprays) and published last year in Pest Control Technology (article attached). Our objective in putting this helpful technique on the label is to better assist users of the product to apply it effectively and with minimal transmission of dust into the air.

5. The Stored Product Pests added to the label are not public health or wood-destroying pests per PR Notice 2002-1. While we are required to maintain data on file, the Agency does not require submission of data for these non-public health pests in order to register, so we do not see why it is an issue to add these pests to the product label, as it does not involve any use sites not already on the label.

7. As discussed, and per our original Application for Registration (if you need a copy, let me know), Silicide (CimeXa) was registered as substantially similar to DRI-OUT Insecticide, EPA No. 71788-1, 100% amorphous silica gel. The pests on our label, except bed bugs, are on the label of the DRI-OUT product. Home Saving Termite Control Inc. supported their registration with efficacy data contained in MRID No. 44613703 as noted on our Data Matrix on file. According to NPIRS, Home Saving Termite Control is the original submitter of this efficacy report, per below, copied from NPIRS:

Branch:
Guideline: 810.3600

MRID Citation

Product ingredient source information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 17, 2015

ENFORCEMENT SENSITIVE

Ms. Cisse W. Spragins, Ph.D.
Chief Executive Officer
Rockwell Labs Ltd
1257 Bedford Avenue
North Kansas City, MO 64116

Subject: Agency Initiated Action – Agency letter dated July 29, 2015
Product Name: SiliCide™
Application Date: September 1, 2015
EPA Registration Number: 73079-12
Decision Number: 508939

Dear Dr. Spragins:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is not acceptable for the following reasons:

1. In a review of you data matrix the Agency noticed that the cite MRID 45125001 for Series 830 (product chemistry) was never accepted by the Agency. You therefore must provide/cite a valid MRID that fulfills the chemistry requirement for this product.
2. Your alternate brand name "Maggie's Fram™ Simply Effective™ Bed Bug Killer is not acceptable it implies heightened efficacy.
3. On page 1 delete "and other manmade structures". This is a vague statement.
4. On page 2 delete "A craft or paint brush is useful for pushing dust into cracks and crevices, and into tufts and folds of mattresses and cushions." These are not acceptable application tools.
5. On page 3 delete the "Stored Product (Pantry and Fabric/Clothes) Beetles and Moths" section. No data was submitted or cited to support this additional use.
6. On page 4 delete "[©XXXX] [Trademark(s) ownership statement" and "[Green Zone is not a third party certification] Used when Green zone Brand logo is used." These statements are vague.
7. On page 5 after For Control of/Kills delete "Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Lice, Fleas Ticks, Stored Product (Pantry and Fabric/Clothes) Beetles and Moths and Drywood Termites". The efficacy data submitted and reviewed by the Agency **ONLY** allowed the Kill claim for Bed Bugs. No data was submitted/cited for the additional pests.
8. On page 5 delete "[WBE Woman Business Enterprise NWBOC Certified (logo)] As factual based on company certification", [Green zone Brand [logo)]] and the Logo option depicted below in grayscale". These are not acceptable claims.

Therefore, your application is not acceptable. No further processing of this application will occur. If you have any questions, please contact Linda A. DeLuise by phone at 703.305.5428, or via email at deluise.linda@epa.gov.

You have 45 days to cite or submit new product chemistry data. If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e).

Sincerely,

Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Office of Pesticide Programs

SiliCide™

ABN: CimeXa™ Insecticide Dust
ABN: Maggie's Farm™ Simply Effective™ Bed Bug Killer

Active Ingredient: Amorphous Silica Gel	98.8%
Other Ingredients	1.2%
Total:	100.0%

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 3 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and other manmade structures, and food handling and food processing establishments.

General Information: SiliCide™ is a desiccant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A craft or paint brush is useful for pushing dust into cracks and crevices, and into tufts and folds of mattresses and cushions. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine up to 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of ~~solution~~ product/water slurry per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind and visible after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring.

Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Stored Product (Pantry and Fabric/Clothes) Beetles and Moths: Treat cracks, crevices and along the edges of cupboards, closets, pantries, shelving units and storage. Treat voids beneath drawer units by removing the lower drawers and treating the well. Treat the voids beneath shelving units or cabinets by removing the kickplate or drilling small access holes in the kickplate. Treat under rugs and along the edges of carpets and baseboards and other infested areas to control carpet beetles.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply in serving areas when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

Manufactured by: Rockwell Labs Ltd [logo]
1257 Bedford Ave
[North] Kansas City, MO 64116
[Phone number] [www.rockwelllabs.com/www.maggiesfarmproducts.com]

[© XXXX] [Trademark(s) ownership statement]
[Green Zone is not a third party certification.] ***Used when Green Zone Brand logo is used.***

Marketing Claims

[Dust] For Control of/Kills: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, Stored Product/Pantry/Fabric/Clothes Beetles and Moths and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

[WBE Woman Business Enterprise NWBOC Certified (logo)] ***As factual based on company certification***
[Green Zone Brand [(logo)]]
Logo options depicted below in grayscale – may be colorized in actual use

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Note to File

Date: September 16, 2015

Registration Number: 73079-12

Decision Number: 508939

PM/RM Name: Linda A. DeLuise

1. **Background**: In a review of the data matrix for this product we noticed that the cite MRID 45125001 for Series 830 (product chemistry) was never accepted by the Agency. The me-too product 71788-1 chemistry review dated November 16, 1998 said that the acceptability of the chemistry data was subject to approval of all data requirements on
2. [redacted]
3. EPA registration Number 73079-12 cited MRID 45125001 to support its chemistry requirement
4. **Decision**: EPA Registration 73079-12 has not cited valid chemistry data to support its registration.

Product ingredient source information may be entitled to confidential treatment

FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert's In-Processing Signature: Carlyn Date: 9.15 PM #: 10

EPA Reg. Number: 73079-12	EPA Receipt Date: 9.3.15

	Checklist Item	Yes	No	N/A
1	**Application Form** (EPA Form 8570-1) - signed?	X		
2	**Confidential Statement of Formula** (EPA Form 8570-29) - signed?		X	
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) - signed?		X	
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?		X	
5	**Data Matrix** (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?		X	
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label included?** (5 copies)	X		
	a) Electronic Label submitted?			
	Comments: Agency initiated Action -Resub?			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 8, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

CISSE W. SPRAGINS, PH.D.
ROCKWELL LABS LTD
D/B/A MAGGIE'S FARM LTD
1257 BEDFORD AVENUE
NORTH KANSAS CITY, MO 64116-

PRODUCT NAME: SILICIDE(TM)
COMPANY NAME: ROCKWELL LABS LTD
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 73079-12
EPA RECEIPT DATE: 09/03/15

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 10, at (703) 305-6701.

Sincerely,

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service {973871=~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 10

Receipt No. S- 973871

EPA File Symbol/Reg. No. 73079-12

Pin-Punch Date: 9/3/2015

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

▣ Inert Cleared for Intended Use ▣ Uncleared Inert in Product

Reviewer: RSD Date: 9/9/15

Remarks:

Rockwell Labs Ltd
creating the future of pest control

September 1, 2015

Registration Division, I&VB 2, PM 10
Document Processing Desk (AMEND)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

Attn: Mr. Richard Gebken/Ms. Linda DeLuise

Re: Silicide™, EPA Reg. No. 73079-12
Response to Agency Initiated Action Dated July 29, 2015
Non-PRIA Amendment

Dear Mr. Gebken/Ms. DeLuise:

In response to your above-noted letter, enclosed please find our revised label (changes highlighted) and CSF for the subject product, along with our Application for Pesticide Amendment for the subject product.

Per our phone conversation, we have amended the CSF to include the trace impurities in the silica gel, and amended the label ingredient statement accordingly.

We are also notifying:
-An additional alternate brand name (both this ABN and the earlier one are noted on the master label)
-An additional pack size
-Addition of stored product beetles and moths to the label (non-public health pests)
-Addition of marketing logos to the label similar to the recently amended labels for 73079-4, 73079-6, 73079-7, 73079-8, and 73079-14
-We have made some other housekeeping changes for consistency with our other labels, including moving the marketing claims to the last page, as well as some minor additions to make the label more useful for users.

Label changes are noted on the enclosed highlighted copy of the label, which has also been sent electronically to Ms. DeLuise per her request.

Many thanks for your kind attention. Please feel free to contact us at 816 283 3167 with any questions or concerns. We look forward to an expeditious review.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

1257 Bedford Ave, North Kansas City, MO 64116 USA · tel: 816 283 3167 fax: 816 283 3173 · www.rockwelllabs.com

Please read instructions on reverse before cc ng form.

Form Approved. OMB No. 2070-0060

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[x] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73079-12	Richard Gebken	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Rockwell Labs Ltd /SiliCide(TM)	10	

5. Name and Address of Applicant *(Include ZIP Code)*

1257 Bedford Ave
North Kansas City, MO 64116

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

[x] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in reponse to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Amendment in response to Agency Initiated Action. Revised CSF to reflect impurities in active ingredient and revised label ingredient statement accordingly. Notification of additional alternate brand name, addition of non-public health pests, marketing logos, additional pack size.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	2 oz, 3 oz, 4 oz, 8 oz,1 lb, 2 lbs, 5 lbs, 10 lbs	label

6. Manner in Which Label is Affixed to Product [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Cisse W. Spragins, Ph.D.	CEO	816 283 3167

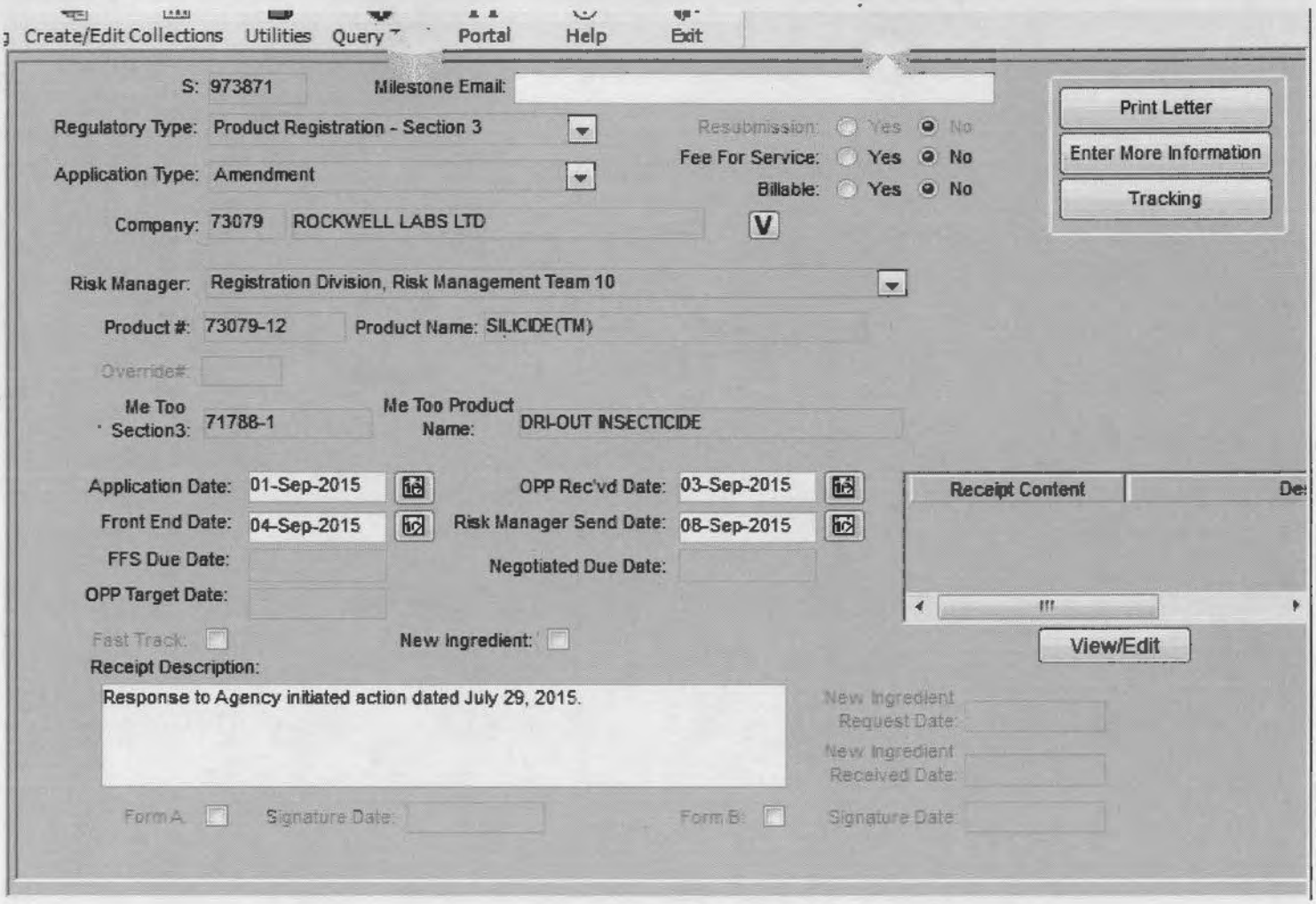
Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
	CEO
4. Typed Name	**5. Date**
Cisse W. Spragins, Ph.D.	9/1/2015

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy


Create/Edit Collections
Utilities
Query
Portal
Help
Exit
S: 973871
Milestone Email:
Regulatory Type: Product Registration - Section 3
Application Type: Amendment
Company: 73079 ROCKWELL LABS LTD
Resubmission: Yes No
Fee For Service: Yes No
Billable: Yes No
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 10
Product #: 73079-12
Product Name: SILICIDE(TM)
Override#:
Me Too Section3: 71788-1
Me Too Product Name: DRI-OUT INSECTICIDE
Application Date: 01-Sep-2015
OPP Rec'vd Date: 03-Sep-2015
Front End Date: 04-Sep-2015
Risk Manager Send Date: 08-Sep-2015
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Response to Agency initiated action dated July 29, 2015.
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 29, 2015

Enforcement Sensitive

Mr. Todd J. Fleischmann
Rockwell Labs Ltd.
1257 Bedford Avenue
North Kansas City, MO 64116

Subject: Agency Initiated Action – correct Active Ingredient Statement
Product Name: SiliCide (TM)
EPA Registration Number: 73079-12

Dear Mr. Fleischmann:

Upon review of the product record, it has come to the Agency's attention that the following changes should be made to the product label:

1) The active ingredient statement on the label and Confidential Statement of Formula (CSF) must be corrected. It should include all elements that are included in the formulation. [redacted] These ingredients MUST sum to 100%. You must express ALL elements that are in the product.
2) A corrected Confidential Statement of Formula MUST also be included in your submission expressing the entire composition of the formulation.
3) In addition, list all alternate brand names that you have requested by notification from the Agency on the Master Label.

Please submit a revised label and Confidential Statement of Formula(s) within 90 days of the date of this letter as an amendment. In addition, you should send an electronic label to deluise.linda@epa.gov. If you have any questions, please contact Linda A. DeLuise by phone at 703.305.5428, or via email at deluise.linda@epa.gov.

Sincerely,

Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Office of Pesticide Programs

Manufacturing process information may be entitled to confidential treatment

---- --------

44613703 Block, M. (1998) Dri-Out: Product Performance Summary: Lab Project

Number: HS/PP/01. Unpublished study prepared by Univ. of California.

72 p.

Thanks and please let me know if you need anything else. We would greatly appreciate approval of the non-chemistry portions, as we were intending to introduce the Maggie's Farm ABN in 2016 and need to proceed with state registration of this ABN product name very quickly. We were just intending to submit the Notification when we received your July 29th letter.

Thank you for your assistance.

Cisse

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd
816-283-3167

This electronic mail transmission, including any attachments, may contain confidential information of Rockwell Labs Ltd. It is intended only for the person(s) named, and the information in such e-mail shall only be used by the person(s) named for the purpose intended and for no other purpose. Any use, distribution, copying, or disclosure by any other persons, or by the person(s) named but for purposes other than the intended purpose, is strictly prohibited. If you received this transmission in error, please notify the sender by reply e-mail and then destroy this e-mail.

From: DeLuise, Linda [mailto:DeLuise.Linda@epa.gov]
Sent: Wednesday, August 19, 2015 1:22 PM
To: Cisse Spragins
Subject: RE: Agency Initiated Action Dated July 29, 2015 Reg. No. 73079-12 Silicide

Hi,

Whatever you want.

Linda

From: Cisse Spragins [mailto:cspragins@rockwelllabs.com]
Sent: Wednesday, August 19, 2015 2:16 PM
To: DeLuise, Linda
Subject: RE: Agency Initiated Action Dated July 29, 2015 Reg. No. 73079-12 Silicide

I'd like Todd to join us on the call, but I can easily conference him on my end if that is easiest (or put him on speaker phone in my office). Just let me know what is easiest for you. Thanks.

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd

On Aug 19, 2015 1:11 PM, "DeLuise, Linda" <DeLuise.Linda@epa.gov> wrote:

SILICA GEL: A BETTE

Dusts are becoming more popular for bed bugs. Although earlier trials with diatomaceous earth were disappointing, University of Kentucky researchers and pest professionals are seeing exciting things with silica gel.

By Michael F. Potter, Kenneth F. Haynes, Jennifer R. Gordon, Larry Washburn, Melody Washburn and Travis Hardin

Bed bugs have long been drenched and dusted with insecticides. While toxicants were more typically applied as liquids, infested beds and belongings also were dusted with such materials as sulfur, pyrethrum and 10 percent DDT powder. Without a simple one-shot solution, companies are again employing dusts in their bed bug management programs.

Today's dust formulations often contain pyrethroids (e.g., Tempo Dust [Bayer Environmental Science], DeltaDust [Bayer Environmental Science]) or neonicotinoids (Alpine [BASF Corp.]) as active ingredients. While such materials can be efficacious, resistance and other factors have fueled interest in dusts that kill via desiccation. *(photo 1)*. In previous studies with diatomaceous earth, the compound performed well in the lab, but poorly in the field (Romero et al. 2009, Potter et al. 2013). The present study focuses on another dust desiccant, silica gel, evaluated in both the lab and in bed bug-infested apartments.

UNDERSTANDING SILICA GEL. Silica gels are white, fluffy, powders manufactured from silica. Silica (Si) comprises more than a quarter of the earth's crust in the form of sand, quartz, clay and other materials. Many plants, including those we eat, absorb soluble forms of silica from soil. Silica does not occur naturally in its pure form, reacting instead with oxygen and water to form silicon dioxide (SiO_2). Thus, the terms "silica" and "silicon dioxide" are often used interchangeably.

Both silica gel and diatomaceous earth (DE) are comprised of silicon dioxide but their origins and manufacture are different. DE is mined from fossilized remains of microscopic plants (diatoms) whose hardened shells contain silica. Silica gel however is synthetically produced, often from sand, via various manufacturing processes. The term "gel" is somewhat misleading since the material is hard and often formed into beads or granules. Silica gel is also *amorphous* (non-crystalline), which greatly diminishes its potential hazard to humans.

Silica gel and other forms of synthetic amorphous silica have many industrial uses beyond insecticides. They are efficient desiccants (drying agents), which is why small bags of the material are often packaged with electronics to prevent moisture accumulation during shipping and storage. Due to their anti-clumping properties, silica gels are sometimes added to powdered foods, pharmaceuticals and cosmetics.

Photo 1. Several dusts are available for bed bug management.

Role as Insecticides. Products containing silica gel have been used by the pest control industry for more than a half century. The first such product (Dri-Die, Fairfield American Corp.) was registered in 1956. Formulations employed for pest control tend to be light, fluffy powders comprised of very small, porous particles. The tiny particles often have an electrostatic charge that helps them adhere to insects crawling over treated surfaces. Sometimes referred to as "aerogels," the resultant dusts can be so light that a pint-size bottle weighs just a few ounces. Because

R BED BUG DESICCANT

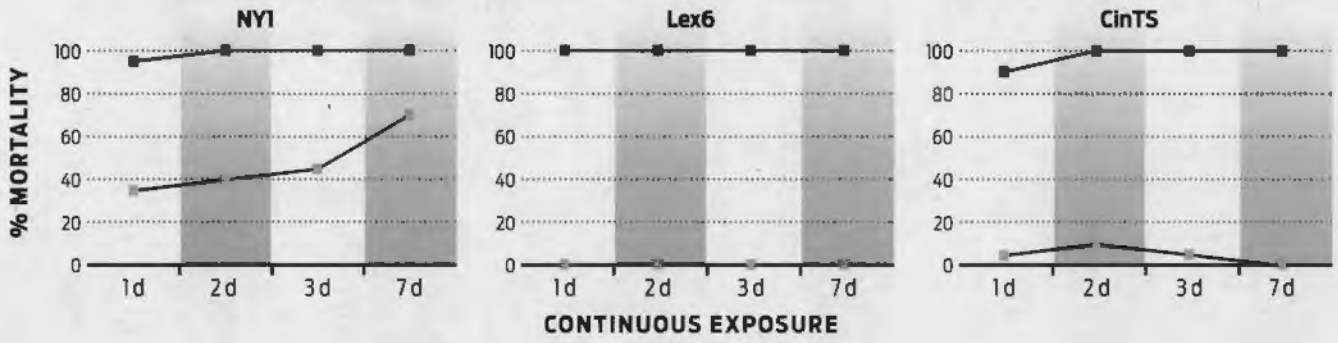
the particles are so lightweight, they often suspend in the air following application. To overcome this, some formulations contain additives such as petroleum distillate (e.g., Drione, Bayer Environmental Science), or are dispensed as liquid aerosols (Tri-Die, BASF Corp.). These two formulations also contain pyrethrins and piperonyl butoxide. Recently, another formulation (CimeXa) containing 100 percent amorphous silica gel and no other additives, was introduced by Rockwell Labs.

Mechanism of Action. Both silica gel and diatomaceous earth kill insects by removing a portion of the razor-thin, waxy outer coating that helps them conserve moisture. As a result, they desiccate and die from dehydration. Like super-fine sandpaper, DE acts principally by *abrading* the protective outer layer of wax as the insect crawls over or through the particles. Instead of causing abrasion, silica gel functions more like a sponge to *absorb* the cuticular waxes onto the particles. Silica gels have tremendous oil-absorbing capability. Studies have shown that such highly "sorptive" dusts are generally more effective than abrasive, less absorptive dusts (such as DE), especially under field conditions (Ebeling 1961, 1971; Subramanyam and Roesli 2000). It should be noted that boric acid is not a desiccant and has little effect on bed bugs since it must be ingested. None of the aforementioned dusts kill insects by clogging the breathing pores (spiracles) as is sometimes erroneously believed.

Safety Profile. Silica gel has low toxicity to mammals. The acute oral LD_{50} is comparable to table salt. As noted previously, the compound is routinely added to foods and pharmaceuticals to prevent clumping. With respect to inhalation hazard, an important distinction must be made between synthetically produced, *non-crystalline* silica gel and naturally occurring *crystalline* silica such as quartz dust. Inhaling tiny particles of crystalline silica as might occur during sandblasting or mining operations can cause silicosis and other chronic respiratory illnesses. This is not a concern with non-crystalline silica gel insecticides. (Authors' note: While inhalation of crystalline silica should not be a concern with diatomaceous earth the risk is even lower with silica gel. Synthetically produced silica gel is nearly 100 percent pure non-crystalline silica. Diatomaceous earth is also largely comprised of amorphous [non-crystalline] silica, but may contain impurities, including small amounts of crystalline silica.)

As with any dusty material, airborne silica gel particles can be somewhat irritating to the eyes and respiratory tract. Due to its

Figure 1. Cumulative effect on three strains of bed bug exposed to CimeXa and Temprid. Bugs were continuously exposed to dry deposits on filter paper. (Data were corrected for control mortality, which never exceeded 15%).



desiccating properties, the dust also has a drying effect on skin which can be avoided by wearing gloves or washing after use.

LABORATORY TRIALS. A series of experiments were conducted to evaluate effects of silica gel on bed bugs. CimeXa insecticide dust (Rockwell Labs, North Kansas City, Mo.) containing 100 percent amorphous silica gel was used in all experiments.

Lab Test #1. In this experiment, adult bed bugs from three different bed bug populations were exposed to surface deposits of either CimeXa dust, Temprid SC (-cyfluthrin + imidacloprid, 0.075 percent) or water alone. The populations collected from Lexington (LEX-6) and Cincinnati (CIN-TS) were previously determined to be highly resistant to pyrethroid insecticides. The third population, collected six years ago from New York (NY-1), was initially highly resistant but has since reverted to being somewhat less resistant. Twenty adult males from each population were confined individually on treated discs of black filter paper. The CimeXa dust was applied with a small hobby brush, leaving a fine, barely visible deposit on the black paper surface. Discs wetted with Temprid or water alone were allowed to dry completely before bugs were placed on treated surfaces. Mortality was recorded after 1, 2, 3 and 7 days of continuous exposure to each treatment.

Results. CimeXa dust was highly effective against all three populations, killing all insects within 24 to 48 hours *(Figure 1)*. The rapid result with silica gel was especially noteworthy given the barely visible amount of dust applied. Temprid SC was considerably less effective, especially against the two populations highly resistant to pyrethroids. No bugs from LEX-6 or CIN-TS succumbed during seven days of continuous confinement on treated surfaces, while 45 and 70 percent mortality occurred at three and seven days exposure of the moderately resistant (NY-1) strain.

Lab Test #2. In three additional experiments, we evaluated effects of silica gel applied as a dust, or mixed with water and sprayed onto surfaces. Adult male bed bugs were treated from

www.pctonline.com/use reader service #55

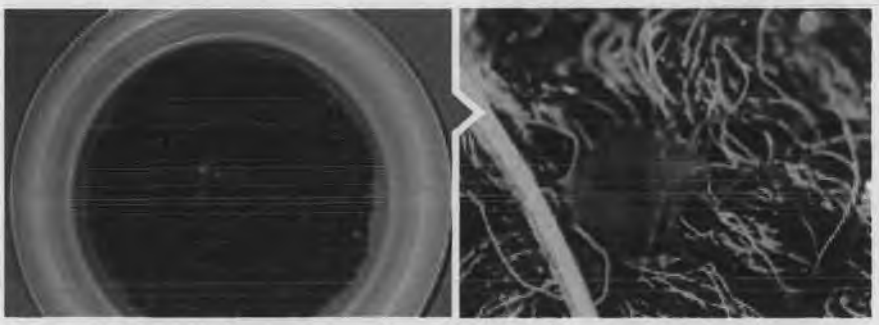
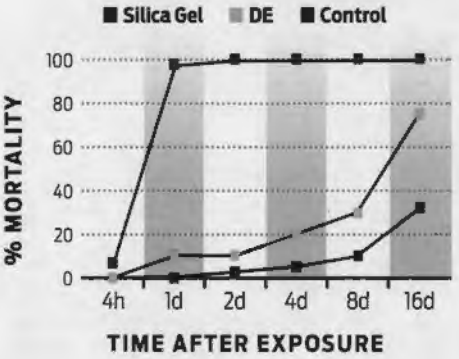


Photo 2. Set up used to simulate brief exposure to treated carpet. Bugs were released atop a watch glass in the center and removed after crawling to the edge of treated carpet.

a moderately resistant population collected eight years ago in Cincinnati (CIN-1). In each experiment, treatments were applied to 4.3-inch diameter discs cut from standard "cut and loop" commercial carpet. To simulate an abbreviated exposure, groups of 10 bed bugs (four replicates per treatment) were released from atop an inverted watch glass in the center of each disc and allowed to crawl across the treated carpet *(photo 2)*. Upon reaching the edge, an exposure ranging from a few seconds to about five minutes, each bed bug was removed and mortality was recorded over a two week period.

In the first such evaluation, CimeXa dust was compared to diatomaceous earth (Mother Earth, BASF Corp.) and carpet left untreated. Both products were applied with a bellows-type hand duster (Executive Pest Control Products, Southlake, Texas) into a Plexiglas cylinder oriented vertically above each disc. The cylinder acted as a void and enabled a more uniform deposition of dust onto the target surface. Another group of discs was left untreated to serve as a control. In a second experiment, bed bugs were exposed to different amounts of silica gel by varying the number of puffs into the Plexiglas void. In a final lab experiment, we compared CimeXa dust to the same material mixed with water and applied as a spray. Dilutions were prepared by mixing 1, 4 and 8 ounces of CimeXa powder per gallon of water. A fine mist spray bottle was used to moisten carpet discs with the aqueous suspension (0.9 ml applied in three squirts).

Figure 2. Cumulative effect on bed bugs following brief exposure to carpet treated with silica gel, diatomaceous earth (DE) or water alone (control).



Results. Silica gel was substantially more effective than diatomaceous earth when bed bugs were exposed briefly to deposits. Almost all of the bugs (97.5 percent) died within 24 hours of walking over silica gel dusted carpet, while only 10 percent succumbed by then to diatomaceous earth *(Figure 2)*. The quantity of CimeXa applied in this instance (1.34 mg/cm2), was typical of commercial practice; however, smaller amounts of dust (0.4 and 0.13 mg/cm2) applied in a subsequent experiment were also effective. Rapid, 100 percent mortality occurred even with the smallest quantity of dust applied *(Figure 3, also see photo 3)*.

Figure 4 (visit www.pctonline.com) shows the result when silica gel was applied as an aqueous spray versus a dust. Both forms of treatment, especially the dust, caused substantial mortality. Although the CimeXa label recommends mixing 16 ounces of powder per gallon of water, we were concerned the milky suspension would leave a noticeable deposit on treated indoor surfaces. Consequently, the maximum dilution we tested was 8 ounces per gallon. This resulted in a silica gel dosage of about 0.55 mg/cm_2, about four times greater than the amount applied as a dust (0.13 mg/cm_2) yet still not as effective.

FIELD TRIAL. The procedure used to evaluate silica gel in bed bug infested apart-

www.pctonline.com/use reader service #56

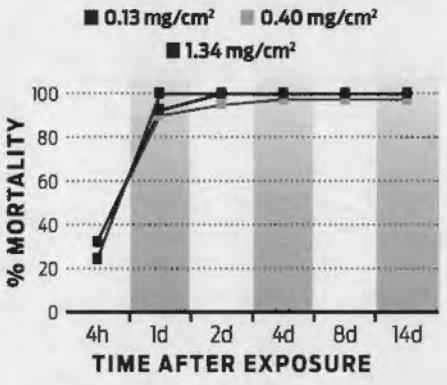
Photo 3. Very small amounts of CimeXa dust applied to carpet were effective. To illustrate and enhance visibility, the 0.4 mg/cm2 rate is shown on black filter paper (CimeXa on right, diatomaceous earth on left).

Photo 4. Many apartments were heavily infested prior to treatment

ments was similar to that used previously to test DE *(see "Where Do Bed Bugs Stand When the Dust Settles?" PCT Dec. 2013)*. Ten infested apartments located in six buildings throughout central Kentucky were chosen for evaluation. Six of the units were treated with CimeXa dust while four were treated with CimeXa mixed with water and applied as a spray. Each apartment was thoroughly inspected before treatment, recording numbers of live bed bugs (adults and nymphs) found on beds, upholstered furniture and in other locations. Several of the units were heavily infested prior to treatment *(photo 4)*. Pretreatment infestation levels based on visual counts ranged from 30 to 1,255 live bugs per apartment (mean=390) in units treated with the dust, and 317 to 2,150 per apartment (mean=1,086) in units treated with the aqueous suspension. Adjacent apartments also were inspected but were not treated since they showed minimal signs of infestation.

Tenants and property managers were informed of the treatment protocol before beginning the study. Residents were advised not to self-treat, and were told to do no preparation prior to our treatment. We did not instruct them to disassemble beds, launder bedding or clothing, or dispose of infested furnishings. Moreover, no encasements were installed on mattresses or box springs. In this manner we hoped to observe the effects of silica gel on bed bug populations, apart from other pest-management tactics.

Figure 3. Cumulative effect on bed bugs following brief exposure to carpet treated with different amounts of silica gel (CimeXa) dust.



Each apartment was treated solely with silica gel, i.e., *no other insecticides were applied. In lieu of using a commercial duster, the powder was applied with soft-bristle paint and cosmetic brushes purchased from retail stores (photo 5)*. The rationale for "brushing" rather than "puffing" on the dry silica gel was to minimize drift and "blow-back" when the dust was applied to non-void areas. Another reason for treating in this manner was that if non-professionals wanted to use desiccant dusts to control bed bugs, they would not have ready access to commercial dusting equipment. The tools we used—rudimentary by industry standards — were nonetheless an improvement over the squeeze bottle-type dispensers typically accompanying dusts sold to the public. For liquid silica gel application, the CimeXa label advises mixing 1 pound of powder per gallon of water. However, based on the previous lab findings and handling considerations, we chose to apply 4 ounces of the powder per gallon of water, using a hand-held, 1-quart sprayer (B&G Equipment Co., Jackson, Ga.)

Application of both the dust and spray were thorough, targeting areas where bed bugs were found or likely to occur especially along seams and edges of mattresses, box springs, bed frames and upholstered furniture. The amount of CimeXa dust applied in six

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Photo 5. The dust was brushed (rather than puffed) into areas where bed bugs were found or likely to occur.

Photo 6. Effects were diminished when CimeXa was applied as an aqueous suspension. The spray deposit was also quite noticeable.

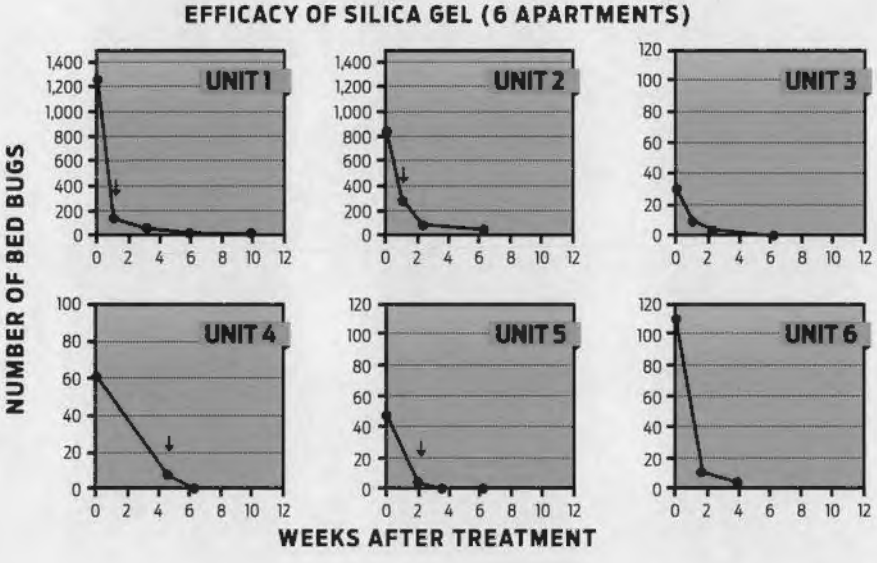
apartments assigned to this treatment was about 1 to 3 ounces. The intent was to apply a fine deposit while leaving no discernable accumulation of powder on surfaces. The amount of CimeXa applied in four apartment as a liquid ranged from 2 to 18 ounces of spray dilution. Some units were treated only once while others were spot treated in some areas a second time.

Follow up inspections of apartments were generally performed weekly or bi-weekly, recording the number and location of live bed bugs on each visit.

Results. CimeXa dust caused a rapid decline in bed bug numbers in treated apartments *(Figure 5)*. Compared to the average initial bed bug count (390), an 82.3 percent reduction was noted after one week and 98.1 percent fewer bugs were found by the final evaluation. These results were markedly better than what we saw when apartments were treated in a similar manner with diatomaceous earth (Potter et al. 2013) and compare favorably to former trials utilizing liquid sprays of Temprid and Phantom (Potter et al. 2008, 2012).

When silica gel was applied as an aqueous suspension, the average reduction in bed bugs after one to two weeks was 35.1 percent; Unit 3 actually had a small (5.4 percent) *increase* in numbers. By the last observation 3.5 to 5 weeks after initial treatment, the average percent reduction was 33.9 percent, with Unit 2 showing an increase of 6.6 percent. Apart from the diminished efficacy, the

Figure 5. Number of live bed bugs found in six different apartments before and after treatment with silica gel dust. A second application was applied to a few areas in some units as depicted by arrows (↓).



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spray left a distinct white deposit on treated surfaces (*photo 6*). Such deposits would likely have been even more evident if the aqueous suspension of silica gel had been applied at the labeled concentration of 1 pound rather than 4 ounces per gallon.

Decreased effectiveness of silica gel applied as an aqueous suspension also was reported by Ebeling (1971). Mixing the dust with water apparently reduces the amount of material picked up by insects crawling over treated surfaces. All four study sites treated with the aqueous suspension of CimeXa were terminated and treated conventionally after four to six weeks, as per our agreement with the occupants.

SUMMARY AND IMPLICATIONS. The findings clearly show that silica gel is a more potent bed bug killer than diatomaceous earth. Abbreviated exposures (as brief as a few seconds) to barely visible deposits resulted in 100 percent mortality of adult bed bugs. Rapid and complete mortality occurred even with highly resistant strains that could not be killed with Temprid the most widely used liquid insecticide for bed bugs (Potter et al. 2013). Lab and field tests further indicate that silica gel is more effective applied as a dust than an aqueous suspension. Although CimeXa's label includes directions for mixing the powder with water and applying it as a spray, the milky suspension leaves a distinct deposit on many indoor surfaces.

It remains to be seen whether brush application of silica gel has utility for bed bug management. Utilization of dust insecticides for this pest has typically involved puffing materials into wall, bed and furniture voids, beneath perimeter edges of carpet, etc. To minimize blow-back and drift of particles, a different approach was needed for treating seams, tufts, folds and crevices, where the majority of bed bugs reside.

Applying dust with a brush has its challenges. The treatment is more tedious than insecticide sprays, and can be messy if not applied with precision. If utilized by non-professionals, it would be crucial to provide clear treatment instructions.

TREATMENT AS PREVENTION? Perhaps most intriguing is the prospect of using silica gel for prevention. Studies have shown that bed bugs are highly mobile within and between living units (Wang et al. 2010, 2012; Potter et al. 2013). Adults and nymphs are routinely captured in monitors placed in sleeping and seating areas, as well as around room perimeters. Recent genetic studies also have revealed that infestations in multi-unit buildings are more often due to active dispersal than repeated introduction by building occupants (Booth et al. 2012). Bed bugs can pass through walls, floors and ceilings via cracks and utility openings. They also infest neighboring units by traversing hallways and gaining access under entry doors.

Based on what we observed, it seems likely that propagation and spread of infestations could be reduced by applying an ultralight deposit of silica gel around the perimeter (baseboard areas) of living units. Depending upon risk of infestation, proactive application also might be warranted under and around beds, sofas and recliners, along common hallways/corridors, and beneath unit entry doors. In the future, we hope to assist in developing tools to make such applications clean and efficient. If not diminished by vacuuming or obscured by household dust, the deposit would likely have a long residual perhaps more than a year. Resistance would be less likely since pests seldom become immune to desiccant insecticides.

Although silica gel has low mammalian toxicity, the powder is light and dusty. Airborne particles can be irritating to the eyes and respiratory tract, and the dust also has a drying effect on skin. Nonetheless, label directions permit application to the entire bed complex, including the mattress. As with any insecticide application, pest management professionals must decide, based on the circumstances, whether application is prudent.

When it comes to bed bugs, there is an escalating need for effective, low-cost, sustainable solutions, especially for underserved populations that are disproportionately suffering. Silica gel, one of our most timeworn insecticides, could be one such solution. **PCT**

Editor's note: Visit www.pctonline.com for a list of references to accompany this article.

Photos © M.F. Potter and K.F. Haynes. Michael F. Potter and Kenneth F. Haynes are professors at the University of Kentucky. Jennifer R. Gordon is a Ph.D. student at the same institution. Lawrence and Melody Washburn own Blue Diamond Exterminating Co. in Hyden, Ky., and Travis Hardin is the branch manager for OPC Services in Lexington, Ky.

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Gebken

February 19, 2014

Document Processing Desk
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Re: SiliCide, 73079-12, 100% Amorphous Silica Gel
Submission of Final Printed Labeling

Dear Sir/Madam,

Attached please find submission of the final printed labeling for all currently marketed pack sizes for SiliCide.

Should you have any questions or comments please feel free to contact me at 816 268 5635.

Sincerely,

Todd J Fleischmann

Todd J. Fleischmann
Chemical Regulatory Specialist

1257 Bedford Avenue, North Kansas City, MO 64116, Tel: 816 283 3167 fax: 816 283 3173 www.rockwelllabs.com

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060

Print Form

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73079-12	Richard Gebken	☒ None ☐ Restricted
4. Company/Product (Name) Rockwell Labs Ltd/CimeXa Insecticide Dust	**PM#** 10	

5. Name and Address of Applicant *(Include ZIP Code)*

1257 Bedford Avenue
North Kansas City, MO 64116

☐ *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☒ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Final Printed Labeling

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	4 oz, 5 lb	☐ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Todd J. Fleischmann	Chemical Reg. Specialist	816 268 5635

Certification

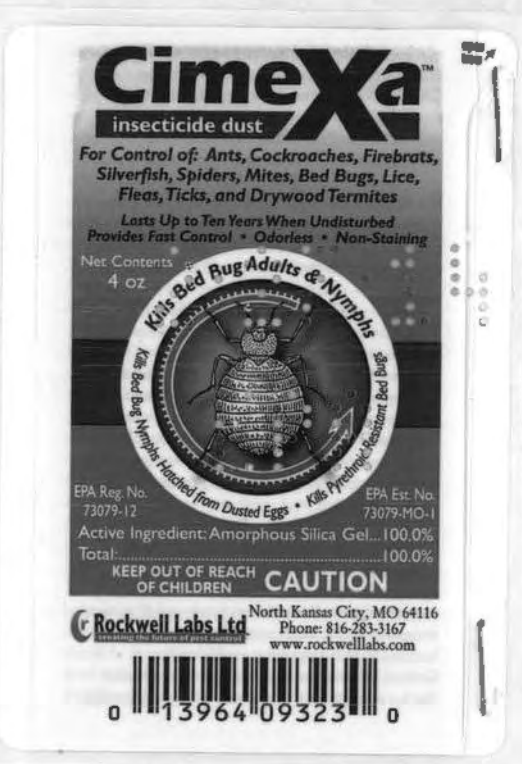
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Todd J Fleischmann	Chemical Reg. Specialist
4. Typed Name Todd J. Fleischmann	**5. Date** 2/19/14

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
DEC. 15, 2011



CimeXa™

insecticide dust

For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

Active Ingredient: Amorphous Silica Gel...100.0%
Total:.....100.0%

EPA Reg. No.: 73079-12
EPA Est. No.: 73079-MO-1

Net Contents: 5 lbs

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Provides Fast Control

Odorless

Non-Staining

Lasts Up to Ten Years When Undisturbed

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: CimeXa™ is a dessicant dust that has no odor and will not stain. When pests contact CimeXa™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of

Continued on back

Continued from front

product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, mop closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:

1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

Rockwell Labs Ltd
creating the future of pest control
North Kansas City, MO 64116
Toll Free: 866-788-4101 • www.rockwelllabs.com

0 13964 09323 0

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EPA Est. No.: 73079-MO-1

Net Contents: 5 lbs

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Continued from front

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4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
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Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

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Rockwell Labs Ltd
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DATA PACKAGE BEAN SHEET

Date: 02-Jul-2013

Decision #: 480413
DP #: (412868)
NON PRIA
Parent DP #:
Submission #: 936528
E-Sub #:

* * * Registration Information * * *

Registration: 73079-12 - SILICIDE(TM)

Company: 73079 - ROCKWELL LABS LTD

Risk Manager: RM 10 - Richard Gebken - (703) 305-6701 Room# PY1 S-7237

Risk Manager Reviewer: Melody Banks MBANKS

Sent Date: 10-Jun-2013 PRIA Due Date: 28-Sep-2013 Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (570) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES RD REVII

Ingredients: 072605, Silicon dioxide(100%)

* * * Data Package Information * * *

Expedite: ◯ Yes ● No Date Sent: 02-Jul-2013 Due Back:

DP Ingredient: 072605, Silicon dioxide

DP Title:

CSF Included: ◯ Yes ● No Label Included: ◯ Yes ● No Parent DP #:

	Assigned To	Date In	Date Out	
Organization:	RD / TRB Chem			Last Possible Science Due Date: 20-Jul-2013
Team Name:				Science Due Date:
Reviewer Name:				Sub Data Package Due Date:
Contractor Name:				

* * * Studies Sent for Review * * *

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

One year Storage Stability and Corrosion Charactertics study required for new registration for CimeXa Insecticide Dust - EPA Reg No. 73079-12.

DP#: (412868) *** Studies Sent for Review *** Decision#: (480413)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
49145501		Fleischmann, T. (2013) Storage Stability and Corrosion Characteristics of CimeXa Insecticide Dust. Project Number: RLL/0212/C24. Unpublished study prepared by Rockell Labs Ltd and W R Grace & Company. 17p.	830.6317/Storage stability	Pass (28-Jun-2013)
49145501		Fleischmann, T. (2013) Storage Stability and Corrosion Characteristics of CimeXa Insecticide Dust. Project Number: RLL/0212/C24. Unpublished study prepared by Rockell Labs Ltd and W R Grace & Company. 17p.	830.6320/Corrosion characteristics	Pass (28-Jun-2013)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

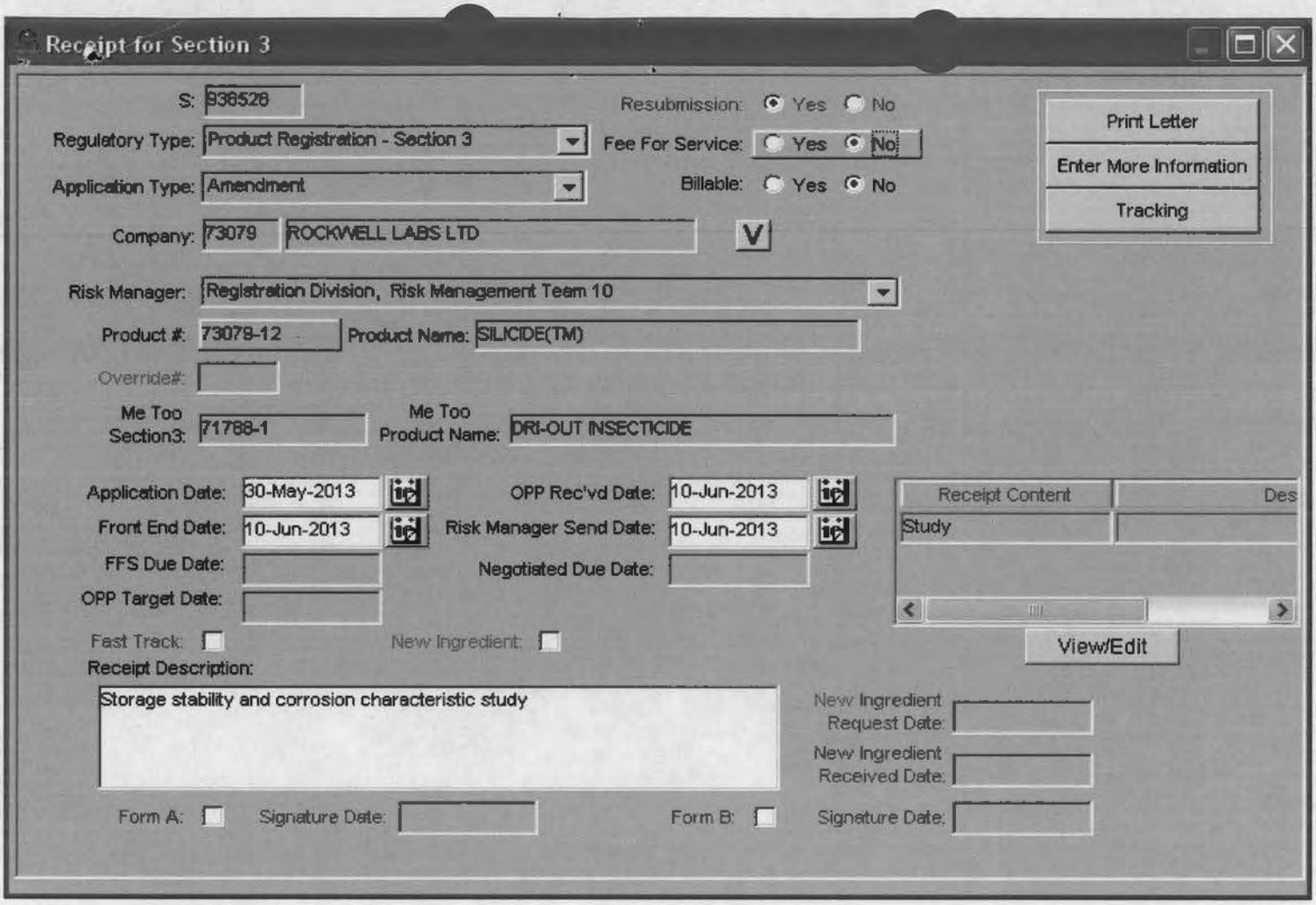
June 21, 2013

ROCKWELL LABS LTD
1257 BEDFORD AVE
NORTH KANSAS CITY, MO 64116

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 10-JUN-13. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.


Receipt for Section 3
S: 936528
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 73079 ROCKWELL LABS LTD
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 10
Product #: 73079-12
Product Name: SILICIDE(TM)
Override#:
Me Too Section3: 71768-1
Me Too Product Name: DRI-OUT INSECTICIDE
Application Date: 30-May-2013
OPP Rec'vd Date: 10-Jun-2013
Front End Date: 10-Jun-2013
Risk Manager Send Date: 10-Jun-2013
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
Study
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Storage stability and corrosion characteristic study
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

Rockwell Labs Ltd
creating the future of pest control

49145500

May 30, 2013

Richard Gebken
U.S. Environmental Protection Agency
Document Processing Desk
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

Re: CimeXa Insecticide Dust, EPA No. 73079-12
Required Storage Stability and Corrosion Characteristics Study.

Dear Mr. Gebken,

Enclosed is three copies of the one year Storage Stability and Corrosion Characteristic study required during registration of CimeXa Insecticide Dust.

WR Grace was gracious enough to provide product analysis and summary results for our study and due to the nature of amorphous silica gel, analysis was performed at initial packaging and after one year storage only. Packaging and corrosion characteristic observations were performed onsite at our facility in Kansas City.

Thank you in advance for your kind attention. Should you have any questions or comments please contact me at 816-268-5635 or by email at toddf@rockwelllabs.com.

Sincerely,

Todd J Fleischmann

Todd J. Fleischmann
Chemical Regulatory Specialist

Rockwell Labs Ltd
1257 Bedford Avenue, North Kansas City, MO 64116
Phone: 816 283 3167 Fax: 816 283 3173 www.rockwelllabs.com

TRANSMITTAL DOCUMENT

Submitter:	Rockwell Labs Ltd 1257 Bedford Avenue North Kansas City, MO 64116
Company Contact:	Todd J Fleischmann
Typed Name of Signer:	Todd J. Fleischmann
Phone:	816 268 5635
Email address:	toddf@rockwelllabs.com

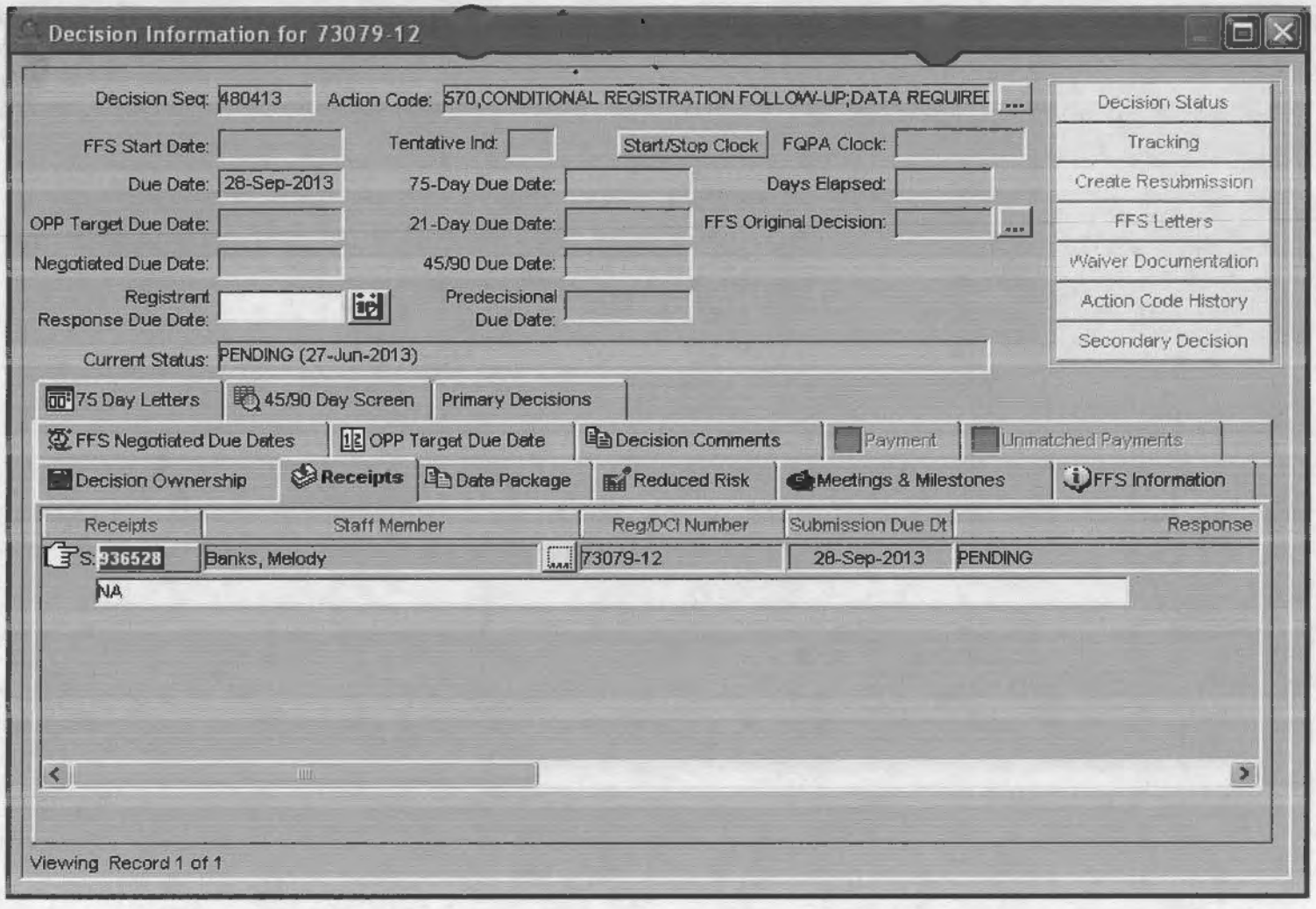
Regulatory Action in Support of Which this Package is Submitted:

49145501 EPA Registration No.: 73079-12, CimeXa Insecticide Dust
One year Storage Stability and Corrosion Characteristic Study submission.

Submission date: May 30, 2013

List of Submitted Documents:

Volume 1—Storage Stability and Corrosion Characteristics Study


Decision Information for 73079-12
Decision Seq: 480413
Action Code: 570,CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED
FFS Start Date:
Tentative Ind:
Start/Stop Clock
FQPA Clock:
Due Date: 28-Sep-2013
75-Day Due Date:
Days Elapsed:
OPP Target Due Date:
21-Day Due Date:
FFS Original Decision:
Negotiated Due Date:
45/90 Due Date:
Registrant Response Due Date:
Predecisional Due Date:
Current Status: PENDING (27-Jun-2013)
Decision Status
Tracking
Create Resubmission
FFS Letters
Waiver Documentation
Action Code History
Secondary Decision
75 Day Letters
45/90 Day Screen
Primary Decisions
FFS Negotiated Due Dates
OPP Target Due Date
Decision Comments
Payment
Unmatched Payments
Decision Ownership
Receipts
Data Package
Reduced Risk
Meetings & Milestones
FFS Information
Receipts
Staff Member
Reg/DCI Number
Submission Due Dt
Response
S: 936528
Banks, Melody
73079-12
28-Sep-2013
PENDING
NA
Viewing Record 1 of 1

73079-12

Memorandum

Storage S. Date

Date: 06/25/13

To: PM 10, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:
- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission

Administrative Materials

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060

Print Form

EPA

United States
Environmental Protection Agency
Washington, DC 20460

[X] Registration
[ ] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73079-12	Richard Gebken	[X] None [ ] Restricted
4. Company/Product (Name) Rockwell Labs Ltd/CimeXa Insecticide Dust	**PM#** 10	

5. Name and Address of Applicant *(Include ZIP Code)*

1257 Bedford Avenue
North Kansas City, MO 64116

[ ] *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in response to Agency letter dated _____
[ ] "Me Too" Application.
[X] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

One year Storage Stability (830.6317)and Corrosion Characteristic (830.6320) Data in support of the unconditional registration of CimeXa Insecticide Dust.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes* [X] No	[ ] Yes [X] No	[ ] Yes [X] No	[ ] Metal [X] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[X] Label [ ] Container	2, 4, 8 oz, 1, 2, 5, 10 lbs	[X] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [ ] Lithograph [X] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Todd J. Fleischmann	Chemical Reg. Specialist	816 268 5635

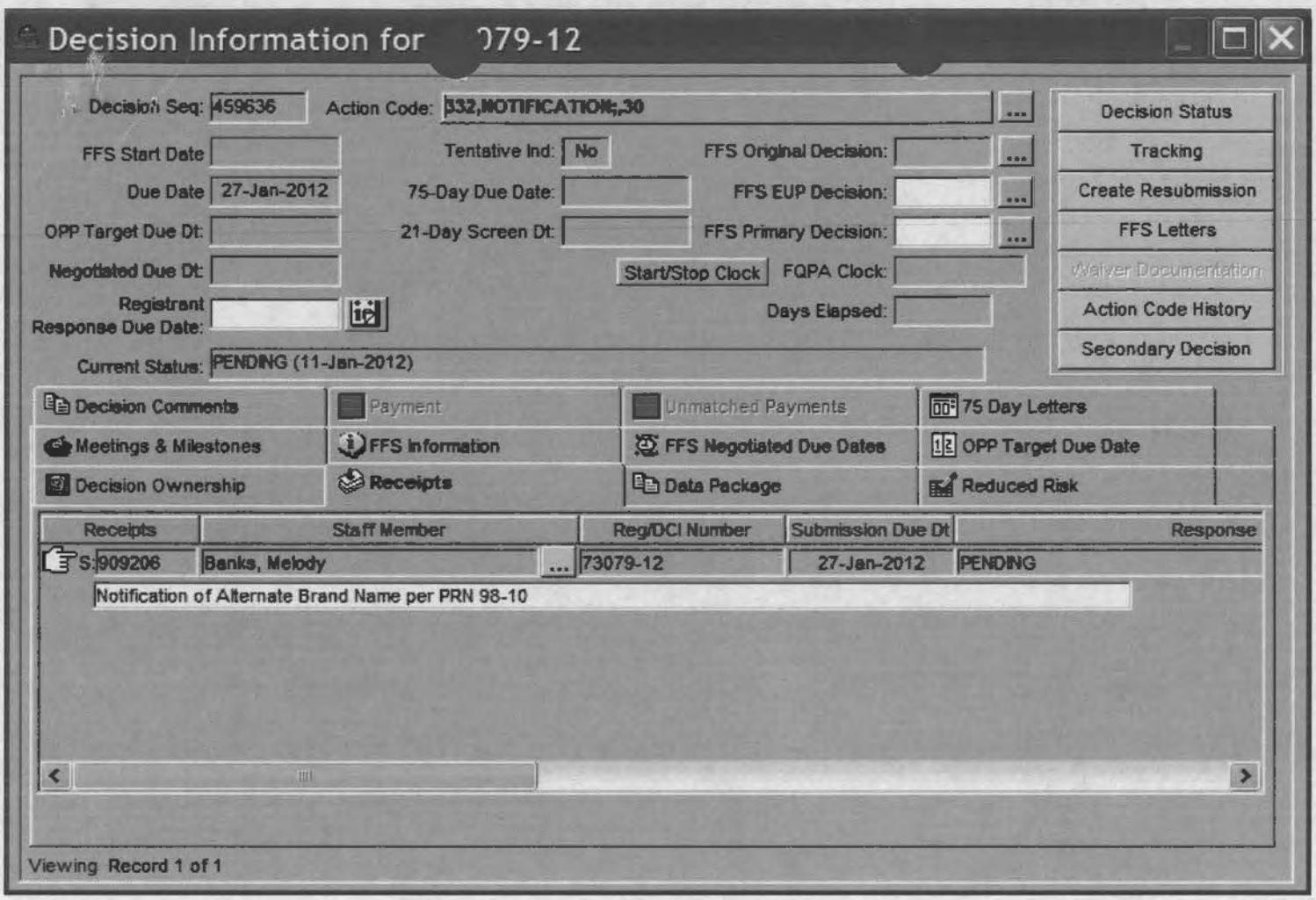
Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Todd J Fleischmann	Chemical Regulatory Specialist
4. Typed Name Todd J. Fleischmann	**5. Date** May 29, 2013

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy


Decision Information for 079-12
Decision Seq: 459636
Action Code: 332,NOTIFICATION;,30
FFS Start Date
Tentative Ind: No
FFS Original Decision:
Due Date 27-Jan-2012
75-Day Due Date:
FFS EUP Decision:
OPP Target Due Dt:
21-Day Screen Dt:
FFS Primary Decision:
Negotiated Due Dt:
Start/Stop Clock
FQPA Clock:
Registrant Response Due Date:
Days Elapsed:
Current Status: PENDING (11-Jan-2012)
Decision Status
Tracking
Create Resubmission
FFS Letters
Waiver Documentation
Action Code History
Secondary Decision
Decision Comments
Payment
Unmatched Payments
75 Day Letters
Meetings & Milestones
FFS Information
FFS Negotiated Due Dates
OPP Target Due Date
Decision Ownership
Receipts
Data Package
Reduced Risk
Receipts
Staff Member
Reg/DCI Number
Submission Due Dt
Response
S:909206
Banks, Melody
73079-12
27-Jan-2012
PENDING
Notification of Alternate Brand Name per PRN 98-10
Viewing Record 1 of 1

Material Sent for Data Extraction

Reg # 93079-12

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

- ☐ New Stamped Label Dated _____
- ☑ Notification Dated 1/26/2012
- ☐ New CSF(s) Dated _____
- ☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

_____

Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

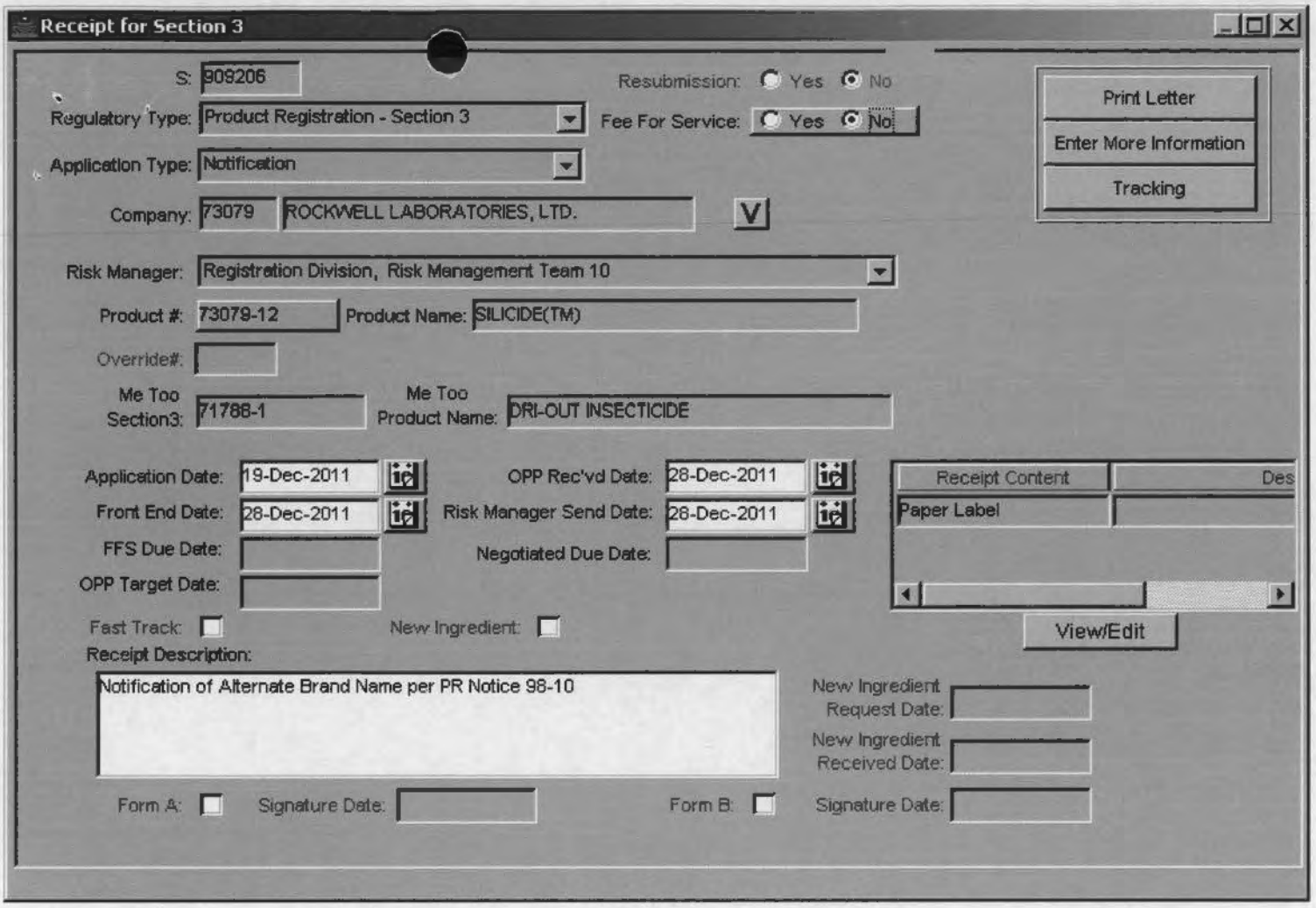
Reviewer: Melody Banks

Phone: 2055413 Division: IB/ED

Date: 1/26/2017

Created February 3, 2011

mgt


Receipt for Section 3
S: 909206
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Notification
Company: 73079 ROCKWELL LABORATORIES, LTD.
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 10
Product #: 73079-12
Product Name: SILICIDE(TM)
Override#:
Me Too Section3: 71768-1
Me Too Product Name: DRI-OUT INSECTICIDE
Application Date: 19-Dec-2011
OPP Rec'vd Date: 28-Dec-2011
Front End Date: 28-Dec-2011
Risk Manager Send Date: 28-Dec-2011
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
Paper Label
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Notification of Alternate Brand Name per PR Notice 98-10
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

[Bracketed text] indicates optional text

NOTIFICATION

JAN 2 6 2012

4/8

SiliCide™
ABN: CimeXa™ Insecticide Dust

[Dust] For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

Active Ingredient: Amorphous Silica Gel	100.0%
Total:	100.0%

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Rockwell Labs Ltd
creating the future of pest control

December 19, 2011

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Re: SiliCide™, 73079-12
Notification of Alternate Brand Name per PR Notice 98-10

To Whom This Concerns:

Enclosed please find the following documents in support of the notification for an alternate brand name for the above mentioned product:

1. Application for Registration (EPA Form 8570-1)
2. Copy of the product master label with the ABN included
3. Two copies of the final 4 oz printed label for your records

This notification is consistent with the provision of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Thank you for your assistance on this matter and should you have any questions or comments please contact me at 816 268 5635.

Sincerely,

Todd J Fleischmann

Todd J. Fleischmann
Chemical Regulatory Specialist

Rockwell Labs Ltd
1257 Bedford Road, North Kansas City, MO 64116
Phone: 816 283 3167 Fax: 816 283 3173 www.rockwelllabs.com

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.

5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060

Print Form

EPA

United States
Environmental Protection Agency
Washington, DC 20460

- [ ] Registration
- [ ] Amendment
- [x] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73079	Richard Gebkin	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Rockwell Labs Ltd/SiliCide(TM)	10	

5. Name and Address of Applicant *(Include ZIP Code)*

1257 Bedford Road
North Kansas City, MO 64116

[ ] *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

NOTIFICATION
JAN 26 2012

EPA Reg. No. _____

Product Name _____

Section - II

- [ ] Amendment - Explain below.
- [ ] Resubmission in response to Agency letter dated _____
- [x] Notification - Explain below.
- [ ] Final printed labels in response to Agency letter dated _____
- [ ] "Me Too" Application.
- [ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of addition of the Alternate Brand Name "CimeXa Insecticide Dust(TM)" per PR-Notice 98-10. (See cover page for additional information.)

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes* [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	2, 4, 8 oz and 1, 2, 5, 10 lbs	[x] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [x] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Todd J. Fleischmann	Chemical Reg. Specialist	816 268 5635

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
Todd Fleischmann	Chemical Regulatory Specialist
4. Typed Name	**5. Date**
Todd J. Fleischmann	Dec 19, 2011

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Rockwell Labs Ltd
creating the future of pest control

December 19, 2011

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Re: SiliCide™, 73079-12
Notification of Alternate Brand Name per PR Notice 98-10

To Whom This Concerns:

Enclosed please find the following documents in support of the notification for an alternate brand name for the above mentioned product:

1. Application for Registration (EPA Form 8570-1)
2. Copy of the product master label with the ABN included
3. Two copies of the final 4 oz printed label for your records

This notification is consistent with the provision of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Thank you for your assistance on this matter and should you have any questions or comments please contact me at 816 268 5635.

Sincerely,

Todd J. Fleischmann
Chemical Regulatory Specialist

Rockwell Labs Ltd
1257 Bedford Road, North Kansas City, MO 64116
Phone: 816 283 3167 Fax: 816 283 3173 www.rockwelllabs.com

[Bracketed text] indicates optional text

NOTIFICATION

JAN 26 2012

SiliCide™
ABN: CimeXa™ Insecticide Dust

[Dust] For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

Active Ingredient: Amorphous Silica Gel	100.0%
Total:	100.0%

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

[Bracketed text] indicates optional text

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.

5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.
6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

[Bracketed text] indicates optional text

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

Rockwell Labs Ltd (logo)
North Kansas City, MO 64116
Toll Free: 866 788 4101 • www.rockwelllabs.com

CimeXa™

insecticide dust

For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

Active Ingredient: Amorphous Silica Gel...100.0%
Total:.....100.0%

EPA Reg. No.: 73079-12
EPA Est. No.: 73079-MO-1

Net Contents: 4 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Provides Fast Control

Odorless

Non-Staining

Lasts Up to Ten Years When Undisturbed

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: CimeXa™ is a dessicant dust that has no odor and will not stain. When pests contact CimeXa™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of

Continued on back

Continued from front

product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:

1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.

2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.

3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.

4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.

5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

Rockwell Labs Ltd
creating the future of pest control
North Kansas City, MO 64116
Toll Free: 866-788-4101 • www.rockwelllabs.com

0 13964 09323 0

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CimeXa™

insecticide dust

For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

Active Ingredient: Amorphous Silica Gel...100.0%
Total:.....100.0%

EPA Reg. No.: 73079-12
EPA Est. No.: 73079-MO-1

Net Contents: 4 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Provides Fast Control

Odorless

Non-Staining

Lasts Up to Ten Years When Undisturbed

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: CimeXa™ is a dessicant dust that has no odor and will not stain. When pests contact CimeXa™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of

Continued on back

Continued from front

product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:

1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.

2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.

3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.

4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.

5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

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Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

Rockwell Labs Ltd
creating the future of pest control
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[Bracketed text] indicates optional text

SiliCide™

[Dust] For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

ACCEPTED
DEC 15 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 73079-12

Active Ingredient: Amorphous Silica Gel	**100.0%**
Total:	**100.0%**

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

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Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

[Bracketed text] indicates optional text

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

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[Bracketed text] indicates optional text

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[Bracketed text] indicates optional text

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
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[Warranty Limitations and Disclaimer

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73079-12 12/15/2011 1 of 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 15, 2011

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd.
1512 Taney Street
North Kansas City, MO 64116

Subject: Amendment: Response to September 15, 2011 Meeting and Agency's July 28, 2011 Letter
SiliCide ™
EPA Reg. No. 73079-12
Your Submission Dated September 19, 2011

Dear Dr. Spragins:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

BeWanda Alexander for

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 15, 2011

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd.
1512 Taney Street
North Kansas City, MO 64116

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EPA Reg. No. 73079-12
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Sincerely,

BeWanda Alexander for

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

[Bracketed text] indicates optional text

SiliCide™

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[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

ACCEPTED
DEC 15 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 73079-12

Active Ingredient: Amorphous Silica Gel.....100.0%
Total:.....100.0%

EPA Reg. No.: 73079-12 EPA Est. No.: (as applicable)

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

[Bracketed text] indicates optional text

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

General Pest (Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites) Treatment: Treat attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, weep holes in brick or siding, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

[Bracketed text] indicates optional text

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

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North Kansas City, MO 64116
Toll Free: 866 788 4101 • www.rockwelllabs.com

73079-12 12/15/2011 1 of 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 15, 2011

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd.
1512 Taney Street
North Kansas City, MO 64116

Subject: Amendment: Response to September 15, 2011 Meeting and Agency's July 28, 2011 Letter
SiliCide ™
EPA Reg. No. 73079-12
Your Submission Dated September 19, 2011

Dear Dr. Spragins:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

BeWanda Alexander for

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

[Bracketed text] indicates optional text

SiliCide™

[Dust] For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

[Kills Bed Bug Adults and Nymphs]
[Kills Bed Bug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bed Bugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

ACCEPTED
DEC 15 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 73079-12

Active Ingredient: Amorphous Silica Gel	**100.0%**
Total:	**100.0%**

EPA Reg. No.: 73079-12 **EPA Est. No.: (as applicable)**

Net Contents: 2 oz, 4 oz, 8 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

DIRECTIONS FOR USE

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[Bracketed text] indicates optional text

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

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Application tips for certain use sites follow:
1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
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4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

[Bracketed text] indicates optional text

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Bed Bug Treatment: Remove bedding and take the bed apart. Treat the interior framework, joints and cracks in the bed frame. Treat the mattress and box spring, paying particular attention to tufts, folds and edges, and the interior framework of the box spring. Remove wall-mounted head boards and treat the back side. Treat picture frames, moldings, hollow furniture legs, cracks and crevices, along baseboards, and any areas with visible signs of infestation, including rugs and carpet. Treat upholstered furniture by removing or lifting (if possible) the cushions and treating the undersurface. Treat the interior framework, cracks and joints of the furniture, and the folds, tufts and edges of cushions and other upholstered areas. Do not treat toys and stuffed animals with product. Treat wall voids by removing electrical switch plate covers to allow access, but don't apply dust directly in electrical boxes. Apply about ¼ oz of dust to each accessible void.

Flea, Lice and Tick Treatment: Treat kennels, pet bedding/rest areas, floor and floor coverings, cracks behind molding and baseboards and other areas where pests may harbor.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

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[Bracketed text] indicates optional text

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Warranty Limitations and Disclaimer

Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

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[Bracketed text] indi...s optional text

7/8

Storage and Disposal

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Rockwell Labs Ltd (logo)
North Kansas City, MO 64116
Toll Free: 866 788 4101 • www.rockwelllabs.com

CimeXa™

insecticide dust

For Control of: Ants, Cockroaches, Firebrats, Silverfish, Spiders, Mites, Bed Bugs, Lice, Fleas, Ticks, and Drywood Termites

Active Ingredient: Amorphous Silica Gel...100.0%
Total:...100.0%

EPA Reg. No.: 73079-12
EPA Est. No.: 73079-MO-1

Net Contents: 4 oz

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: **CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Provides Fast Control

Odorless

Non-Staining

Lasts Up to Ten Years When Undisturbed

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages, transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: CimeXa™ is a desiccant dust that has no odor and will not stain. When pests contact CimeXa™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application Rates and Methods: Apply at a rate of 2 ounces per 100 square feet. In attics and crawlspaces, apply at a rate of 1 lb per 1000 square feet. Use a handheld bellows, bulb or puffer bottle type duster to apply a light, visible film. A power duster may also be used. **Power duster use is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.** Liquid Application: The product may be used as a spray, paint on application, or foam. Combine 1 lb of

Continued on back

Continued from front

product with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. The product does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the product/water slurry and inject directly into galleries and voids.

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6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

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Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a dry place. Do not store where children or animals may gain access.

Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

Rockwell Labs Ltd
creating the future of pest control
North Kansas City, MO 64116
Toll Free: 866-788-4101 • www.rockwelllabs.com

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 26 2012

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Todd J. Fleischann
Rockwell Labs Ltd
1257 Bedford Road
North Kansas City, MO 64116

Subject: Label Notification(s) for Pesticide Registration 2007-4

Dear Mr. Fleischann:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated for December 12, 2011 for:

Alternate Brand Name **CimeXa ™ Insecticide Dust**

The Registration Division (RD) has conducted a review of this request for applicability Under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

EPA Registration Number 73079-12 **SiliCide™**

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Melody Banks on 703 305-5413or via e-mail at banks.melody@epa.gov.

Sincerely,

Mark Suarez
Product Manager 11
Insecticide Branch
Registration Division (7504P)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM:

To: BeWanda Alexander

From: Kevin Sweeney

Date: December 8, 2011

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD

DP barcode: 395909
Decision no.: 455549
Submission no: 904234
Action code: 570
Product Name: SiliCide
EPA Reg. No or File Symbol: 73079-12
Formulation Type: RTU Dust
Ingredients statement from the label with PC codes included: 100% Silicon dioxide (PC code 072605)
Application rate(s) of product and each active ingredient: 2 oz./100 square feet

I. **Action Requested:** review response to DER dated July 26, 2011 and to Agency's NOR dated July 28, 2011

II. **Background:** Registrant submitted an application for a silicon dioxide (Amorphous silica gel) product to include bed bugs. Bed bugs were not listed on the cited label. The registrant submitted a study to evaluate the efficacy of the active ingredient against bed bug adults, nymphs and eggs. The study was reviewed and evaluated in light of the submitted labeling and associated use pattern. The Agency requested the registrant to remove a: "Kills resistant bed bugs" claim; the high application rate of 1 pound/250 square feet; and to provide supporting information on the origin and characteristics of the pyrethroid resistant Epic center strain.

III. **An MRID was not submitted but the registrant provided a written response to each of the Agency's comments.**
- Retain the claim: "Kills pyrethroid resistant bed bugs" based on the difference between the modes of action of silica dioxide (a desiccant) and pyrethroid insecticides (neural toxins).
- Retain the high application rate because the cited product included this application rate and the cited and subject products were substantially similar.
- Reorganized the label's directions for use.
- A description of the development and maintenance of the pyrethroid resistant Epic Center bed bug strain. Resistance ratios (based on LT_{50} values derived from continuous exposure to the label rate applied to unpainted hardwood) were provided for three pyrethroid insecticides(β-cyfluthrin, bifenthrin and deltamethrin). A Probit Analysis was used to determine the LT values.

IV. ENTMOLOGIST'S RECOMMENDATIONS:

1. The revised label is acceptable.

Rockwell Labs Ltd
creating the future of pest control

September 19, 2011

Registration Division, PM Team #10
Document Processing Desk
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

Attn: Richard Gebken/BeWanda Alexander

Re: SiliCide™, EPA Reg. No. 73079-12
Response to Your Letter and Notice of Registration Dated 28 July 2011

Dear Mr. Gebken/Ms. Alexander:

Thank you for the above-noted letter and Notice of Registration, and for your time on the conference call on September 15, 2011 with Mr. Kevin Sweeney, and Todd Fleischmann of Rockwell. Per your letter and our conference call, enclosed please find five copies of the revised label for this product. Changes are as follows:

-We have made the directed changes to the Precautionary, First Aid and Use Restrictions section.

- Application rates - as discussed on the conference call, these rates are the same as the cited similar product, as required (and correspond with the rate we tested on bed bugs).

-We have reorganized the Directions for Use in a more logical manner. The first section after the General Information covers all the "Application Rates and Methods" in one section (with some more detail added, as directed). This is followed by the section with treatment instructions for General Pests, followed by an added section for Bed Bugs (detailed as required in your letter), an added section for Fleas, Lice and Ticks, followed by the sections for Drywood Termite Treatment and Prevention, and lastly the section for Food Handling Establishments. We changed the order of the listed pests at the top of the label to correspond to the order in which the application directions are listed.

-We have not made any changes to use sites/pests or any other changes except as noted.

1257 Bedford Rd, North Kansas City, MO 64116 USA
tel: 816 283 3167 fax: 816 283 3173 www.rockwelllabs.com

-We have kept the statement "Kills Pyrethroid-Resistant Bed Bugs" on the label. As discussed on the conference call, this statement is scientifically obvious due to the mode of action of the active. In addition, we have taken specific pains to supply data on bed bugs with a documented significant level of resistance. Attached to this letter is some additional information from Dr. Dini Miller at Virginia Tech on how the pyrethroid-resistance was determined in the strain of bed bugs used in the study we submitted. Inasmuch as we have taken pains to prove this claim, and there is no specific regulatory prohibition of such a claim, there is no justification for the Agency to prohibit this claim. Just because the claim is scientifically obvious does not mean it is immediately obvious to any non-scientific person who might use the product. Furthermore, the statement provides relevant information for bed bug control. Thank you.

Many thanks for your time and consideration. We look forward to a favorable and expeditious response. Please do not hesitate to contact Todd Fleischmann or me at 816 283 3167, or email me at cspragins@rockwelllabs.com if you have any questions or concerns.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

1257 Bedford Rd, North Kansas City, MO 64116 USA
tel: 816 283 3167 fax: 816 283 3173 www.rockwelllabs.com

Determination of Pyrethroid Resistance in Bed Bugs

Epic Center strain bed bugs are a pyrethroid resistant strain of bugs (Table 1), collected from a field population in Cincinnati, OH, and reared in the Dodson Urban Pest Management Lab since February 2008. A resistance ratio for the Epic Center strain bed bugs was calculated in August 2009 by comparing the LT50 value of Epic Center bugs to the values generated from the same tests on Harlan strain (a known susceptible strain of bugs). Testing was as follows. Liquid formulations of commercial pesticides were prepared at the label rate and applied to the point of run off to hardboard panels. Panels were allowed to dry for two hours before ten adult bed bugs (5 male, 5 female) were confined on the dried pesticide residues. Bed bugs were confined continuously until 100% of the test bugs were dead, or 10% mortality was observed in the control replicates. Mortality was used to calculate LT50 values via PoloPlus software (LeOra Software, 2001). Harlan strain bed bugs typically have LT50 values for pyrethroids that are measured in minutes to hours. Epic Center bed bugs produced LT50 values calculated in days. Therefore, the resistance of the Epic Center bugs to some commonly used pesticides ranges from about 80 - 369 times greater than the resistance of a susceptible strain (the resistance ratio).

The bed bugs are currently maintained on a diet of chicken blood, being fed every 7 d for 20 minutes. Bed bugs are housed in plastic jars containing a folded piece of cardboard for harborage. Jars are closed with a mesh top to allow feeding through the mesh without opening the jar. Rearing jars are kept in an environmental chamber at 27° C, 60% RH, and on a 12:12 L: D photoperiod. Bed bugs are fed 5 d before tests are conducted.

Table 1. Resistance ratios for Epic Center strain bed bugs calculated from LT_{50} tests.

Insecticide	Resistance Ratio*
ß-cyfluthrin 0.05%	78
Bifenthrin 0.06%	112
Deltamethrin 0.06%	369

* Resistance ratios were calculated from comparisons between LT_{50} values generated from dried residue tests using Harlan (susceptible) bed bugs and Epic Center bugs.

Dini Miller, Ph.D.
Tim McCoy, M.S.
Dodson Urban Pest Management Lab
Virginia Tech University

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg. Number:	Date of Issuance:
73079-12	JUL 28 2011
Term of Issuance: Unconditional	
Name of Pesticide Product: SiliCide™	

NOTICE OF PESTICIDE:
X Registration
___ Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):
Rockwell Labs Ltd
1512 Taney Street
North Kansas City, MO 64116

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is **unconditionally** registered in accordance with FIFRA sec. 3(c)(5). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3).

1. You will make the following label changes before you release the product for shipment:

   a) Revise the EPA Registration Number to read "EPA Reg. No. 73079-12."

   b) Revise Precautionary Statements to read as follows:

   "Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet"

   c) The acute toxicity profile for this product is as follows:

Acute oral toxicity	IV
Acute dermal toxicity	IV
Acute inhalation toxicity	IV
Primary eye irritation	III
Primary skin irritation	IV
Dermal sensitization	Negative

Signature of Approving Official:
Wanda Alexander for
Richard Gebken Product Manager
Insecticide Branch/Registration Division (7505P)

Date: July 28, 2011

Enclosure

Based on the acute inhalation and dermal toxicities profile (category IV), you may delete the "If Inhaled" and "If on Skin" from the First Aid statements. If you leave the "If Inhaled" first aid statement on the label, revise the statement to read as follows: Move person to fresh air; If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible; Call a poison control center or doctor for further treatment advice. Add the heading "First Aid" about the first aid statement.

d) Replace the bed bug application rate "one pound/1000 square feet" with "20 oz/1000 square feet" base on the 2 oz/100 square feet rate. The liquid application rate appearing at the end of the label is too high for bed bug control at one pound per 250 square feet. Revise the liquid application rate to 5 oz per 250 square feet.

e) Add bed bug application directions under the *Directions for Use* section of the label. The directions must include applications to bed frames along with crack and crevice/spot treatments in sleeping areas. Fully described wall voids application. State whether or not the product can be applied to mattresses, box springs, carpets, bedding, and/or upholstered furniture. Add the prohibition "Do not treat toys and stuffed animals with product". You must also state what application equipment should be used to make bed bug applications.

f) Revise all instances of the word "Bedbugs" to read "bed bugs" because bed bugs are "true bugs" in entomological terms.

g) Under *Use Restrictions* delete "For prolonged exposure, use a NIOSH-approved dust mask respirator with an N, P, R, HE filter". Statements suggesting the use of a respirator are limited to restricted use pesticide products.

h) Delete the claim "Kills Pyrethroid-Resistant Bedbugs"

2. Generate and submit the results of an one year storage stability (830.6317) and corrosion characteristics (830.6320) study with the required observations made at 0, 3, 6, 9, and 12 months intervals, to the Agency on completion.

3. Please submit three (3) copies of your final printed labeling before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at www.alexander.bewanda@epa.gov or (703) 305-7460.

[Bracketed text] indicates optional text

SiliCide™

[Dust] For Control of: Ants, Firebrats, Spiders, Bedbugs, Cockroaches, Drywood Termites, Lice, Fleas, Ticks, Mites, and Silverfish.

[Kills Bedbug Adults and Nymphs]
[Kills Bedbug Nymphs Hatched from Dusted Eggs]
[Kills Pyrethroid-Resistant Bedbugs]
[Provides Fast Control]
[Lasts Up to Ten Years When Undisturbed]
[Odorless]
[Non-Staining]

Active Ingredient: Amorphous Silica Gel	100.0%
Total:	100.0%

EPA Reg. No.: 73079-X X EPA Est. No.: as applicable

Net Contents: 2 oz, 5 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs

KEEP OUT OF REACH OF CHILDREN
CAUTION

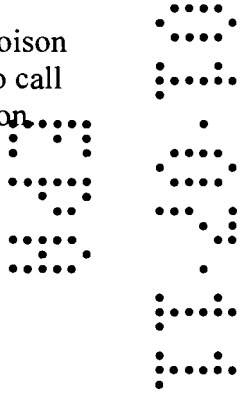
PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

First Aid: If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. **If on Skin:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If Inhaled: Remove person to fresh air.

Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment. You may also call 1-800 858 7378 for emergency medical treatment information.



ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 28 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.
73079-12

[Bracketed text] indicates optional text

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions: In edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed, or in serving areas when food is exposed, this product may only be applied as a crack and crevice treatment. Any product remaining outside of cracks and crevices must be cleaned up and removed.

Avoid inhalation of dust. For prolonged exposure, use a NIOSH-approved dust mask respirator with an N, P, R, HE filter.

Application Directions

Use Sites: In and around residential, multi-family, commercial, industrial, institutional, municipal, agricultural, research, daycare, health care, educational, recreational, and office buildings, hotels, motels, garages , transport vehicles, warehouses, theaters, and food handling and food processing establishments.

General Information: SiliCide™ is a dessicant dust that has no odor and will not stain. When pests contact SiliCide™, the product clings to their exoskeleton and absorbs the waxy coating, causing death from dehydration.

Application: Apply at a rate of 2 ounces per 100 square feet, or 1 lb per 1000 square feet in attics and crawlspaces. Using a bellows or other appropriate duster, apply a light, visible film in attics, crawl spaces, trash closets, utility closets, behind baseboards, around the perimeter of dropped ceilings, in hollow furniture legs; under and behind bedding, appliances and vending machines; in wall voids and voids under and behind cabinets, sinks and tubs; in drawer wells, garbage chutes, pipe chases, elevator pits, around drains, around electrical conduits and in cracks and crevices where insects may harbor. Focus application in areas where insects or their signs are seen.

Application tips for certain use sites follow:

1. In attics, be sure to get dust near the eaves and vent pipes where insects often first enter, as well as around any pipes or potential access points between the attic and the main structure.
2. When treating cabinetry areas, if there is no gap between the lower cabinets and the kickplate, then small holes can be drilled to access the voids. Escutcheon plates around pipes can also be pulled back to allow access to voids.
3. The bottom drawers in kitchen and bathroom cabinets can be removed and dust applied into drawer wells. No dust should be left exposed when drawers are replaced.
4. Electrical switch plate covers can be removed to allow access to voids, but dust shouldn't be applied directly in electrical boxes.
5. If there are cracks between baseboards, cabinets, doorframes, hinges, counters or trim, and walls, these cracks can be lightly dusted with product. If practical, these areas can be sealed once insect problems have been eliminated, to help prevent future problems.

6. Insects need moisture, so kitchen and bath areas and areas immediately surrounding them, and any other damp areas should be carefully inspected and treated if necessary.

Food Processing and Handling Establishment Application, including Federally-Inspected Meat and Poultry Plants: In food areas, only apply dusts in cracks, crevices, and other inaccessible areas. Avoid contamination of food and feedstuffs. Avoid introducing the product into the air. Never apply powder directly to a surface where food is stored, prepared or served. Any dust that is left visible after treatment should be removed and the exposed surface washed. Food areas include: processing areas, including enclosed systems such as syrup and oil plants, dairies, and mills; packing areas, including bottling, canning, wrapping and boxing; receiving areas; storage areas, including edible waste storage; and serving areas, such as dining rooms. In these areas, dust sparingly into cracks and crevices, such as along baseboards and between construction elements. Do not apply when facility is in operation or when food is exposed. Do not treat surfaces likely to be contacted by food.

Drywood Termite Treatment: For existing infestations of drywood termites, use a drill or probe to locate and access galleries and inject product directly into galleries. An electric or pneumatic duster which produces a pressure of at least 30 psi and no more than 175 psi should be used to force dust throughout galleries. Any holes left in framing covering must be closed and sealed.

Drywood Termite Prevention: Apply at a rate of 1 lb per 1000 square feet in attics and crawlspaces so that the product coats wood members. Drill periodic access holes into wall and ceiling voids and inject the dust at a rate of 1 lb per 1000 square feet of surface area. Insure sufficient holes are drilled to cover interior framing in voids. The working pressure range of electric or pneumatic dusters should be from 30 to 175 psi and the air supply should be dried if the relative humidity is higher than 50%.

Pressurized application is limited to cracks, crevices, voids, attics and crawlspaces to insure containment of dust particles.

Liquid Application: SiliCide™ may be used as a spray, paint on application, or foam. Combine 1 lb of silica powder with 1 gallon of clean water. Apply approximately 1 quart of solution per 250 square feet of area to be treated. Silica powder does not dissolve in water and will be left behind after evaporation. For injection treatment, add the appropriate amount of foaming agent to the SiliCide™/water slurry and inject directly into galleries and voids.

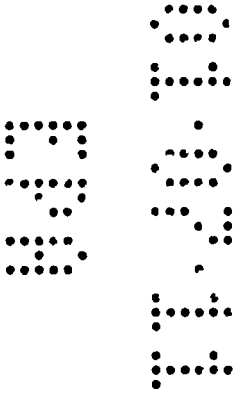
Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Storage: Store in a dry place. Do not store where children or animals may gain access.
Disposal: If Empty: Non-refillable container. Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or **1-800-CLEANUP** which is managed as a public-private partnership.

[Bracketed text] indicates optional text

[Warranty Limitations and Disclaimer
Seller makes no warranty expressed or implied, concerning the use of this product other than as indicated on the label. Buyer accepts this material subject to these terms, and assumes all risk of usage and handling except when used or handled in accordance with this label. There are no expressed or implied warranties of merchantability or fitness for any particular purpose, except as specifically stated herein. To the extent consistent with applicable law, the manufacturer shall not be liable for any consequential damages based on the use of the product.]

Rockwell Labs Ltd (logo)
North Kansas City, MO 64116
Toll Free: 866 788 4101 • www.rockwelllabs.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

JUL 26 2011

MEMORANDUM:

To: BeWanda Alexander

From: Kevin Sweeney 7/26/11

Date: July 26, 2011

Subject: PRODUCT PERFORMANCE DATA EVALUATION RECORD

DP barcode: 387010
Decision no.: 444104
Submission no: 888576
Action code: R310
Product Name: SiliCide
EPA Reg. No or File Symbol: 73079-RE
Formulation Type: RTU Dust
Ingredients statement from the label with PC codes included: 100% Silicon dioxide (PC code 072605)
Application rate(s) of product and each active ingredient: 2 oz./100 square feet

I. Action Requested: review bed bug study, cited label (EPA Reg. No. 71788-1) , and proposed label.

II. Backgrounnd: Registrant submitted an application for a silcon dioxide (Amorphous silica gel) product to include bed bugs. Bed bugs are not listed on the cited label. The registrant submitted a study to evalaute the efficacy of the active ingredient against bed bug adults, nymphs and eggs.

III. MRID Summary: (see attached primary review)

(1) This was a non-GLP study to evalaute the efficacy of the product against all bed bug life stages. Tests were conducted against adults, nymphs and eggs sparately.

(2) For evaluation of efficacy against the adult and nymphal life stages, the bed bugs were exposed to silicon dioxide treated panels in a no-choice test. Panels were treated at label rate of 2 oz/100 square feet and moratlity was recorded every 1-2 hours until 100% mortality was achieved in all replicates of a treatment. Bed bugs remained in contact with the treated surface throughout the test. 100% mortality was achieved by 15 hours while all nymphs died in 10 hours. Untreated control mortality was not reported *per se* but a Prohibt Analysis was used.

(3) For the egg kill/hatch evaluations the dust was painted on with a brush and hatch recorded over an eight day period. Untreated control mortality was 0% and hatching was successful (99%). Treatments did not prevent egg hatch and eggs remained viable with 97% of the eggs hatching. However, following hatch the first stage nymphs all died by day 8.

(4) The strain of bed bugs used in this experiment was the Epic Center strain, which originated from one collection in Cinnicinati, Ohio USA. The study director refers to these as pyrethroid resistant but it is unclear what data support this finding. The label makes a claim to kill pyrethroid resistant bed bugs but that might be expected anyway given the dessicant mode of action of this product. The following open

access citations support the claim of Epic Center strain resistance and these articles should have been cited in this study. Both articles include co-authorship of the project director.

a. http://www.mdpi.com/2075-4450/2/2/232/pdf *Insects* **2011**, *2*, 232-242; doi:10.3390/insects2020232
b. http://www.mdpi.com/2075-4450/2/3/326/pdf *Insects* **2011**, *2*, 326-335; doi:10.3390/insects2030326

(5) Note that in the egg study the project director mentions an application rate of 2 oz/1000 square feet but I am assuming this to be a typographic error and it should have been stated as the label rate of 2 oz/100 square feet.

IV. RECOMMENDATIONS:

1. The study is acceptable but should have included the citations above together with the raw data for untreated controls from the adult and nymphal bioassays.
2. The label claims are acceptable.
3. The bed bug application rate should be 20 oz/1000 square feet instead of one pound /1000 square feet - based on the 2 oz/100 square feet rate. The liquid application rate appearing at the end of the label is too high for bed bug control – at one pound per 250 square feet.
4. Directions for bed bug applications must be added to the label. The directions should include applications to bed frames along with crack and crevice/spot treatments in sleeping areas. Wall voids application s should be fully described. Second, the label has to state whether or not the product can be applied to matresses, box springs, carpets, bedding, and/or upholstered furniture. A prohibiton should be added "Do not treat toys and stuffed animals with this product." The registrant should state what application equipment should be used to make bed bug applications.
5. "Bedbugs" should be changed to read "bed bugs" because bed bugs are "true bugs" in entomological terms.

TASK 2 DATA EVALUATION RECORD

STUDY TYPE: Product Performance

MRID: 483474-01; McCoy, T.C., Silica Dust Formulation Efficacy for Control of Bed Bugs (*Cimex lectularius*), September 10, 2010.

No guideline exists for bed bugs

Product Name: SiliCide™
EPA Reg. No. or File Symbol: 73079-RE
Decision number: 444104
DP number: 387010

Prepared for
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC 20460

Prepared by
Summitec
Task Order No.: 2-07

Robert H. Ross

Primary Reviewer:
Robert Ross, M.S.

Signature: _____
Date: JUL 25 2011

Secondary Reviewer:
Gene Burgess, Ph.D.

Signature: Gene Burgess
Date: JUL 25 2011

Program Manager
Robert Ross, M.S.

Signature: Robert H. Ross
Date: JUL 25 2011

Quality Assurance:
Jennifer Goldberg, B.S.

Signature: Jennifer Goldberg
Date: JUL 25 2011

RECOMMENDED CLASSIFICATION: **Unacceptable, but upgradable**

Disclaimer

This review may have been altered subsequent to the contractors' signatures above.

DP BARCODE No.: 387117 FILE SYMBOL No.: 73079-RE DECISION No.:444104
PC Code(s): 072605 ACTION CODE: R 310
FOOD Use: NO NON-FOOD YES

DATE OUT: 05/19/11

SUBJECT: End Use Product Chemistry Review
Product Name: SILICIDE (TM)

FROM: Indira Gairola
Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

TO: Be Wanda Alexander / Richard Gebken PM 10
Insecticide Branch /Registration Division (7505P)

Company Name: Rockwell Laboratories, Ltd.
Formulation Type: GRANULAR SOLID (Insecticide)

INTRODUCTION:

The applicant requested a new (non food use) end use product. In support of the application, the applicant is relying on Product chemistry data corresponding to guideline 830 series, group A & group B on EPA Reg. # 71788-1 Applicant claims the product to be substantially similar to EPA Reg. #71788-1. TRB has been asked to determine the acceptability of the product chemistry data and the proposed basic CSF dated 01/05/11.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Silicon dioxide 100.0%.

2. There are no inerts this is 100.0%.

3. Confidential Statement of Formula(s):

[X] Basic - Dated: 01/05//11

[X] Alternate None

Alternate CSF(s) complies with 40CFR§152.43: [ ] Yes [X] NA

5. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concur with product label (PR Notice 91-2)
[X] Yes, if not, explain below:

Metallic equivalent: [ ] Yes [X] NA;
Soluble arsenic: [ ] Yes [X] NA
Isomeric ratios: [ ] Yes [X] NA
Acid equivalent: [ ] Yes [X] NA; {name} acid equivalent = 4.05% 2,D acid equivalent

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%:	[ ] Yes	[X] No	[ ] NA
Methanol at > 4%:	[ ] Yes	[X] No	[ ] NA
Sodium nitrite	[ ] Yes	[X] No	[ ] NA
Sodium nitrate	[ ] Yes	[X] No	[ ] NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?
[ ] Yes [X] No

Is the sub statement in compliance with PR Notice 97-6? [ ] Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 98-6 (total Release Fogger)?
[ ] Yes, [ ] No [ ] [X] NA if not, explain below:

The product label uses the term "inert ingredients" rather than "other ingredients."

d. Label requires an additional Storage and Disposal statement: [ ] Yes [X] No; if yes explain below:

6. Group **A**: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	**Study Title**		**Data submitted**		**TRB's Assessment of Data**	**MRID Nos.**
			Yes	**No**		
830.1550	Product Identity & Composition			X	A	Cited 451250-01
830.1600	Description of materials used to produce the product			X	A	" "
830.1650	Description of formulation process			X	A	" "
830.1670	Discussion on the formation of impurities			X	A	" "
830.1700	Preliminary analysis					
830.1750	Certified limits (158.350)	Standard certified limits				
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method				A	" "

A = Acceptance, N = Not Acceptable, G = Data Gap,
W = Waiver Request, I = In Progress, NA = Not Applicable

7. Group **B:**

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Granular solid	A	Cited 451250-01
830.6315	Flammability	Does not contain any flammable components	NA	" "
830.6316	Excludability	Does not contain any components of explosive nature	NA	" "
830.7000	pH	5.0-8.0	A	" "
830.7300	Density (units)	10-20 lbs /cu ft	A	" "

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request,
NA = Not applicable, I = In progress

CONCLUSIONS:

TRB has reviewed the CSF and product chemistry data cited for the proposed end use product and has concluded:

1. Basic CSF dated 01/05/11 is acceptable and attached

2. Data required for Sub Group A (MRID #cited 451250-01) were reviewed data corresponding to guideline 830.1600 (description of materials used to produce the product), 830.1650 (description of the formulation process), 830.1670 (discussion of the formation of impurities), and 830.1750 (certified limits) are cited (EPA Reg. # 71788-1) are acceptable.

3. All required Group B data (MRID #cited 451250-01) were reviewed and determined to be Acceptable; except guidelines 830.6317 (storage stability) and 830.6320 (corrosion characteristics). The registrant is required to generate one year storage stability & corrosion characteristics study. The recommended observations periods are 0, 1, 3, 6, 9, & 12 months intervals.

4. The proposed label was screened as it pertains to the product chemistry requirements. The final review of the proposed label and uses are the purview of the PM team.

5. The subject product is substantially similar to EPA Reg. # 71788-1 therefore the cited data are acceptable.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Office of Chemical Safety and Pollution Prevention

July 5, 2011

MEMORANDUM

Subject:	Name of Pesticide Product:	SiliCide™
	EPA File Symbol:	73079-RE
	DP Barcode:	D387118
	Decision No.:	444104
	Action Code:	R310
	PC Code:	072605 Silicon dioxide
From:	Breann Hanson, Biologist Technical Review Branch (TRB) Registration Division (RD; 7505P)	B Hanson Bryan T. Bach July-5-2011
To:	BeWanda Alexander, RM Team 10 Insecticide Branch Registration Division (7505P)	
Applicant:	Rockwell Labs Ltd. 1512 Taney St. North Kansas City, MO 64116	

FORMULATION FROM LABEL

Active Ingredients:		% by wt
072605	Amorphous Silica Gel	100.0
Total:		**100.0**

ACTION REQUESTED: The Risk Manager requests: "Please review the cited acute toxicity data submitted in support of this new product. The proposed product is similar to EPA Reg. # 71788-1."

BACKGROUND: Rockwell Labs Ltd. (herein the "registrant") has applied for registration of SiliCide™, EPA File Symbol: 73079-RE, claiming data used in registration Dri-Out, EPA Reg. No. 71788-1, may be cited for registration of 73079-RE. 73079-RE is a 100% repack of [redacted] Included in the data package were the basic CSF for the proposed product (CSF dated 1/5/2011), data matrix and letter from the registrant. A proposed label was not included.

To satisfy the acute toxicity data requirements, the registrant is citing the acute oral, acute dermal, acute inhalation, primary eye irritation, primary skin irritation and dermal sensitization studies (MRIDs 446137-07 through -09) that were reviewed to support registration of Dri-Out, EPA Reg. No. 71788-1. According to the most recent CSF for 71788-1 (dated 6/30/1998), it too is a 100% repack of [redacted]. Dri-Out has a label claim of 100% Amorphous Silica Gel.

The above mentioned acute toxicity studies were reviewed and all classified as acceptable in a prior TRB memo (B. Backus; DP Barcode: D248699; EPA File Symbol: 71788-R; 20/NOV/1998).

COMMENTS AND RECOMMENDATIONS:

1. TRB reviewed the acute toxicity data referenced above and determined that these data do support the registration of the proposed product; the proposed and cited products are substantially similar in toxicity. Although the proposed product is a 100% repack of a currently unregistered product, the cited product, which is also a 100% repack of the same unregistered product, has a complete acute toxicity profile based on submitted data. The acute toxicity data reviewed for registration of 71788-1 can be cited for registration of 73079-RE.

2. The acute toxicity profile for the proposed product, SiliCide™, EPA File Symbol: 73079-RE, is as follows:

acute oral toxicity	IV	cited	EPA Reg. No 71788-1/MRID 44613704
acute dermal toxicity	IV	cited	EPA Reg. No 71788-1/MRID 44613705
acute inhalation toxicity	IV	cited	EPA Reg. No 71788-1/MRID 44613706
primary eye irritation	III	cited	EPA Reg. No 71788-1/MRID 44613707
primary skin irritation	IV	cited	EPA Reg. No 71788-1/MRID 44613708
dermal sensitization	Negative	cited	EPA Reg. No 71788-1/MRID 44613709

3. The proposed basic CSF must be reviewed and accepted by the TRB Product Chemistry Team.

Product Source Information May be Entitled to Confidential Treatment

4. **LABELING**: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 073079-00012
PRODUCT NAME: SiliCide™

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals: Causes moderate eye irritation. Avoid contact with eyes or clothing. [Wear protective eyewear.]* Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid:

If in eyes:
-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

* Protective eyewear may be specified, if appropriate.

5. Based on the Registration Eligibility Document (RED) for Silicon Dioxide (September 1991), the label must include a statement for use of a dust mask. Although appropriate language is noted under the *Use Restrictions* section of the proposed label (i.e., "Avoid inhalation of dust. For prolonged exposure, use a NIOSH-approved dust mask respirator with an N, P, R, HE filter"), this reviewer recommends the language appear under the *Precautionary Statements* portion of the label as well. Appropriate language is noted on the cited label for 71788-1 (dated 25/MAR/1999). No other changes are required to the precautionary or first aid statement sections of the proposed label.

Rockwell Labs Ltd
creating the future of pest control

January 5, 2011

Registration Division, PM Team #10
Document Processing Desk (APPL)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

Attn: Richard Gebken

Re: SiliCide™, 73079-xx, 100% Amorphous Silica Gel
Registration Application, PRIA Code R340

Dear Mr. Gebken:

Enclosed please find documents in support of registration of the above-noted product.

This product is a repack of [redacted] Our proposed product is substantially similar to DRI-OUT™ Insecticide, EPA Reg. No. 71788-1. The difference between our proposed product and DRI-OUT™ is that we have added claims against bedbugs to the label. We are submitting efficacy data to support those claims.

The following documents in support of this amendment are enclosed:

-Proof of PRIA fee payment
-Documentation to support our small business partial fee waiver
-Application for Pesticide Registration
-Five copies of the proposed product label
-3 copies of the study "Silica Dust Formulation Efficacy for Control of Bed Bugs (*Cimex lectularius*)"
- CSF
- Certification with Respect to Citation of Data
- Data Matrix
- Formulators Exemption

Product ingredient source information may be entitled to confidential treatment

1512 Taney St, North Kansas City, MO 64116 USA
tel: 816 283 3167 toll free: 866 788 4101 fax: 816 283 3173
www.rockwelllabs.com

Many thanks for your kind attention. Please feel free to contact us at 816 283 3167 with any questions or concerns. We look forward to a favorable and expeditious review.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO

1512 Taney St, North Kansas City, MO 64116 USA
tel: 816 283 3167 toll free: 866 788 4101 fax: 816 283 3173
www.rockwelllabs.com

R 310

PM 10 **Delivered by** Schaible on 1/20/11

RD 21-day representative

Please circle: **Data failure** **Jacket failure**

FAILED PRIA Action

PM call
- a.i. not currently registered?
- no product chem provided, but same formulation as another registered product

PM: Please review and determine if the package is acceptable or should be kicked out by 1/26/11.

By 19th of 21 days.

If the package is acceptable and corrections can be made on the PM team, please have the jacket transferred to yourself. If this package should be rejected, please prepare/finalize a 21-day rejection letter and inform Steve Schaible. Your decision and action by the yellow highlighted date is appreciated.

21-Day Screen Completed by Contractor

21-Day Expires on 1-28-11

Jacket # 7307 9-RE
MRID# 483474

Content Screen: Recommended to Pass/Fail

86-5 Review: Passed/Failed/NA

Transfer This Jacket to:

STEPHEN SCHAIBLE

PM-10

Completion of 21-Day Content Screen

PM- 10

EPA Reg. #(File Symbol) 73079-RE

Decision # D_____

Data package delivered to you on 1/20/11.
(date)

jacket started PRIA screen

Jacket/Mini-jacket will be transferred to you today.
(Pick up from Document Center)

Thank you,

Registration Division's 21-Day Content Team

coating on jacket
72079-AE
1/19/11

Memorandum

Date: 1 / 12 / 11

To: PM 10, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:
- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 11, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CISSE W. SPRAGINS
ROCKWELL LABORATORIES, LTD.
D/B/A ROCKWELL LABS LTD
1512 TANEY STREET
NORTH KANSAS CITY, MO 64116-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 07-JAN-11. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

TRANSMITTAL DOCUMENT

Name and Address of Submitter: Rockwell Labs Ltd
1512 Taney St.
North Kansas City, MO 64116 USA

Regulatory Action in Support of Which This Package is Submitted:

Registration of SiliCide™
EPA File Symbol.: 73079-xx

Transmittal Date: 5 Jan 2011
By Federal Express

List of Submitted Studies:

48347401 Volume 1: Silica Dust Formulation Efficacy for Control of Bed Bugs (*Cimex lectularius*) – 100% Amorphous Silica Gel

Company Official: Cisse W. Spragins, Ph.D.

Signature

Company Name: Rockwell Labs Ltd

Company Contact: Cisse W. Spragins, Ph.D. tel: 816 283 3167

TRANSMITTAL DOCUMENT

Name and Address of Submitter: Rockwell Labs Ltd
1512 Taney St.
North Kansas City, MO 64116 USA

Regulatory Action in Support of Which This Package is Submitted:

Registration of SiliCide™
EPA File Symbol.: 73079-xx

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Company Official: Cisse W. Spragins, Ph.D.

Signature

Company Name: Rockwell Labs Ltd

Company Contact: Cisse W. Spragins, Ph.D. tel: 816 283 3167

Rockwell Labs Ltd
creating the future of pest control

January 5, 2011

Registration Division, PM Team #10
Document Processing Desk (APPL)
Office of Pesticide Programs/EPA
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

By Federal Express

Attn: Richard Gebken

Re: SiliCide™, 73079-xx, 100% Amorphous Silica Gel
Registration Application, PRIA Code R340

Dear Mr. Gebken:

Enclosed please find documents in support of registration of the above-noted product.

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- CSF
- Certification with Respect to Citation of Data
- Data Matrix
- Formulators Exemption

Product ingredient source information may be entitled to confidential treatment

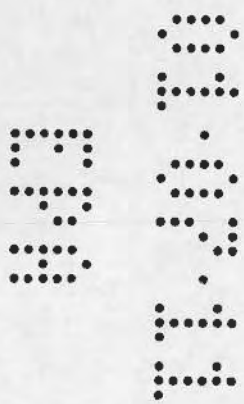
1512 Taney St, North Kansas City, MO 64116 USA
tel: 816 283 3167 toll free: 866 788 4101 fax: 816 283 3173
www.rockwelllabs.com

Many thanks for your kind attention. Please feel free to contact us at 816 283 3167 with any questions or concerns. We look forward to a favorable and expeditious review.

Sincerely,

Rockwell Labs Ltd

Cisse W. Spragins, Ph.D.
CEO



1512 Taney St, North Kansas City, MO 64116 USA
tel: 816 283 3167 toll free: 866 788 4101 fax: 816 283 3173
www.rockwelllabs.com

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 1-7-11

Experts In-Processing Signature: B.R Date 1-11-11 Fee Paid: Yes ✓

Division management contacted on issues No_____ Yes_____ Date_____

EPA Reg. Number: 73079-RE	EPA Receipt Date: 1-7-11

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	**yes** X	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
5	**Data Matrix** (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	**yes** X	**no**			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to** http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	**Is the data package consistent with PR Notice 86-5** (link to PRN 86-5)	X		
8	**Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)**			X
9	**If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)**			X
10	**Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.**			
	a) List study (or studies) not included with application			

Comments:

Though an active ingredient of the same name as the one in this product was conditionally registered several years ago, per Richard Gebken that product is no longer in existence and therefore the product under consideration has an unregistered source (consistent with the registrant's response to my request for clarification - see email). We leave it to the PM to decide how to proceed.

Because the formulation is identical to that of another product no product chemistry data were submitted. Though (due to different usages) this is not a 100% repack, it still (per Steve Schaible) should not be necessary to submit prod. chem data because of the identical formulation. The data matrix currently lists product chemistry data as "for." We leave it to the PM to decide how to proceed.

Study passed 86-5 review.
No inerts for review.
Jacket failed due to contents.

RM 1/18/11

483474

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. <u>All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.</u>

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

pt for Rejection Phone calls

Contact Name: Cisse Spragins
Phone #: (816) 283-3167
Email:

First Call/Initials:
Date: 1/12/11
Time: 11am

Second Call/Initials:
Date:
Time:

This is Rachel Metz **, EPA contractor.**

I'm calling regarding your submission in support of Silicide (73079-RE) **.**

We have found the following deficiencies regarding:
PR Notice 86.5: Yes or No
Volume/Study Title:

Volume/Study Title:

Volume/Study Title:

Additional volumes continued on back of page: Yes or No

Application Package: Yes or No

- Reg # on CSF, Formulator's Exemption should not be written as NA

These deficiencies have been approved by EPA.
The corrections can be faxed to 703-305-5060/Attn: _____.

Second Call/Email:
If we do not receive the corrections by _____, we will process your submission, accordingly. Please direct all future calls and correspondence to the appropriate EPA Risk Manager.

SiliCide 73079-RE
Cisse Spragins
to:
Rachel Metz
01/13/2011 04:09 PM
Please respond to cspragins
Show Details

Personal privacy information

Rachel – I left you a voicemail regarding your questions on SiliCide, 73079-RE. I am in the office the rest of the afternoon. I will be available tomorrow on my cell phone: [redacted]

I wanted to clarify a couple of things with this product. The silica material we are intending to use, [redacted] is not to my knowledge registered at EPA by [redacted] at this time. There is, however, quite a bit of data referenced in EPA files regarding this product, so it may have been registered at one time. I also know that it is, or has been, used in a number of other registered products combined with other things, typically a conventional liquid insecticide, such as pyrethrin, or pyrethroids. We basically wish to register a straight silica product, like the DRI OUT registration we cited, but with bed bugs added to the label, for which we supplied efficacy.

Please let me know what additional info you need from us for this product. Thanks.

Cisse

Cisse W. Spragins, Ph.D.
Rockwell Labs Ltd
www.rockwelllabs.com
816 283 3167

Speak truth to power.

Product ingredient source information may be entitled to confidential treatment

UNI. .J STATES ENVIRONMENTAL PROTEC . AGENCY
WASHINGTON, D.C. 20460

January 11, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-444104
EPA File Symbol or Registration Number: 73079-RE
Product Name: SILICIDE(TM)
EPA Receipt Date: 07-Jan-2011
EPA Company Number: 73079
Company Name: ROCKWELL LABORATORIES, LTD.

CISSE W. SPRAGINS
ROCKWELL LABORATORIES, LTD.
D/B/A ROCKWELL LABS LTD
1512 TANEY STREET
NORTH KANSAS CITY, MO 64116-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,
Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{888576_~

This package includes the following

- ◉ New Registration
- ○ Amendment

☑ Studies? ☑ Fee Waiver?

☐ volpay % Reduction: 75

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 10

Receipt No. S-	888576
EPA File Symbol/Reg. No.	73079-RE
Pin-Punch Date:	1/7/2011

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R310

Granted: R310

Amount Due: $ 4,507.00

Parent/Child Decisions:

No inerts for review FM 1/18/11

☒ Inert Cleared for Intended Use ☐ Uncleared Inert in Product

Reviewer: _____ Date: 1-11-11

Remarks:

Bed Bug Data Included

FEE FOR SERVICE

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: 1/7/11		EPA Reg. Number: 79079-RE		
	Check List Item	Yes	No	N/A
1	Has the **PRIA Fee been Paid**; is a copy of the check or Pay.gov receipt included in the Submission Package?	✓		
2	Is an **Application Form** (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	✓		
3	Is a **Confidential Statement of Formula** (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	✓		
4	Is a **Formulator's Exemption Statement** (EPA Form 8570-27) Included in the Submission Package?		✓	
5	Is a **Certification with Respect to Citation of Data** (EPA Form 8570-34) Included in the Submission Package?	✓		
6	Is a **Data Matrix** (EPA Form 8570-35) Included in the Submission Package?	✓		
7	Is a **Label** Included in the Submission Package?	✓		
8	Are **Data** Included in the Submission Package?	✓		
9	**Is the Submission an Amendment?**		✓	

Cisse Spragins

From: paygovadmin@mail.doc.twai.gov
Sent: Wednesday, January 05, 2011 1:06 PM
To: cspragins@rockwelllabs.com
Subject: Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

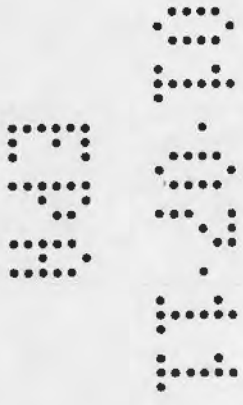
Your transaction has been successfully completed.

Transaction Summary

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 2528K78H
Agency Tracking ID: 74164346131

Account Holder Name: Cisse Spragins
Transaction Type: Sale
Transaction Amount: $1,202.00
Billing Address: 1512 Taney St.
Billing Address 2: 1512 Taney St.
City: North Kansas City
State/Province: MO
Zip/Postal Code: 64116
Country: USA
Card Type: Visa
Card Number: **********8776
Transaction Date: Jan 5, 2011 2:06:05 PM

Decision Number:
Registration Number: 73079-xx
Company Name: Rockwell Labs Ltd
Company Number: 73079
Action Code: R310



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States
Environmental Protection Agency
Washington, DC 20460

[x] Registration
[ ] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
73079-xx	Richard Gebken	[x] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Rockwell Labs Ltd /SiliCide(TM)	10	

5. Name and Address of Applicant *(Include ZIP Code)*

1512 Taney St.
North Kansas City, MO 64116

[ ] *Check if this is a new address*

6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. 71788-1

Product Name DRI-OUT Insecticide

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in repsonse to Agency letter dated _____
[ ] "Me Too" Application.
[x] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

New application

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [x] No	[ ] Yes [x] No	[ ] Yes [x] No	[ ] Metal [x] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[x] Label [ ] Container	2 oz, 5 oz, 1 lb, 2 lbs, 5 lbs, 10 lbs	label

6. Manner in Which Label is Affixed to Product [x] Lithograph Paper glued Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Cisse W. Spragins, Ph.D.	CEO	816 283 3167

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
	CEO
4. Typed Name	**5. Date**
Cisse W. Spragins, Ph.D.	1/5/11

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Cisse Spragins

From: paygovadmin@mail.doc.twai.gov
Sent: Wednesday, January 05, 2011 1:06 PM
To: cspragins@rockwelllabs.com
Subject: Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Your transaction has been successfully completed.

Transaction Summary

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 2528K78H
Agency Tracking ID: 74164346131

Account Holder Name: Cisse Spragins
Transaction Type: Sale
Transaction Amount: $1,202.00
Billing Address: 1512 Taney St.
Billing Address 2: 1512 Taney St.
City: North Kansas City
State/Province: MO
Zip/Postal Code: 64116
Country: USA
Card Type: Visa
Card Number: **********8776
Transaction Date: Jan 5, 2011 2:06:05 PM

Decision Number:
Registration Number: 73079-xx
Company Name: Rockwell Labs Ltd
Company Number: 73079
Action Code: R310

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Rockwell Labs Ltd, 1512 Taney St., North Kansas City, MO 64116, 816 283 3167	EPA Registration Number/File Symbol 73079-xx
Active Ingredient(s) and/or representative test compound(s) Silica Gel	Date 1/5/11
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) indoor and outdoor, non-crop	Product Name SiliCide(TM)

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

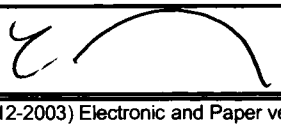
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 1/5/11	Typed or Printed Name and Title Cisse W. Spragins, Ph.D., CEO

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

R 310

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI). Must submit Group A and B product chemistry data for each proposed product unless it's a 100% identical (repack): YES or (NO) (circle one) But the formulation is identical to a previous product - see Comments.

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGAI	
		Yes	No	Yes	No	Yes	No
830.1550	Product Identity & Composition		X				
830.1600	Description of materials used to produce the product		X				
830.1650	Description of formulation process		X				
830.1670	Discussion on the formation of impurities		X				
830.1700	Preliminary analysis		X				
830.1750	Certified limits (158.345)		X				
830.1800	Enforcement analytical method		X				

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGAI	
		Yes	No	Yes	No	Yes	No
830.6302	Color		X				
830.6303	Physical State		X				
830.6304	Odor		X				
830.6313	Stability to normal and elevated temperatures metal and metal ions						
830.6314	Oxidation/Reduction (Chemical incompatibility)		X				
830.6315	Flammability		X				
830.6316	Explodability		X				
830.6317	Storage stability		X				
830.6319	Miscibility		X				
830.6320	Corrosion Characteristics		X				
830.6321	Dielectric Breakdown Voltage		X				
830.7000	pH		X				
830.7050	UV/ Visible Absorption						
830.7100	Viscosity		X				
830.7200	Melting Point						
830.7220	Boiling Point						
830.7300	Density		X				
830.7370	Dissociation Constant						
830.7550	Partition Coefficient						
830.7840	Water Solubility						
830.7950	Vapor Pressure						

Grayed out = data not required

R 310

New products must either: 1) supply the product specific acute toxicity 6 pack data (listed below), or 2) pravide a bridging rationale dacument. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Data submitted		Cited	
		Yes	No	Yes	No
870.1100	Acute Oral (LD50)		X	✓	
870.1200	Acute Dermal (LD50)		X	✓	
870.1300	Acute Inhalation (LC50)		X	✓	
870.2400	Acute Eye Irritation		X	✓	
870.2500	Acute Dermal Irritation		X	✓	
870.2600	Dermal Sensitization		X	✓	

Efficacy – which guideline is used depends on the proposed label use

Guideline No.	Study Title	Data submitted		Cited		Comments
		Yes	No	Yes	No	
810.3100	Soil Treatments for Imported Fire Ants		X			NA
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments		X		X	NA
810.3300	Treatments to Control Pests of Humans and Pets	✓			X	
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments		X		X	NA
810.3500	Premises Treatments		X	?		unclear
810.3600	Structural Treatments		X			NA
810.3800	Methods for Efficacy Testing of Termite Baits		X			NA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

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DATA MATRIX

Date 1/5/11	EPA Reg No./File Symbol 73079-xx	Page 1 of 1
Applicant's/Registrant's Name & Address Rockwell Labs Ltd, 1512 Taney St., North Kansas City, MO 64116	Product SiliCide(TM)	

Ingredient Silica gel

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Series 830	Product Chemistry	45125001	WR Grace and Co.	for	
Series 810	Product Performance / Efficacy	44613703	Home Saving Termite Control	pay	
870.1100	Acute Oral Toxicity in Rats	44613704	Home Saving Termite Control	pay	
870.1200	Acute Dermal Toxicity in Rats	44613705	Home Saving Termite Control	pay	
870.2400	Primary Eye Irritation in Rabbits	44613707	Home Saving Termite Control	pay	
870.2500	Primary Skin Irritation in Rabbits	44613708	Home Saving Termite Control	pay	
870.1300	Acute Inhalation Toxicity in Rabbits	44613706	Home Saving Termite Control	pay	
870.2600	Dermal Sensitization in Guinea Pigs	44613709	Home Saving Termite Control	pay	
Series 810	Product Performance / Efficacy	not assigned	Rockwell Labs Ltd	own	

Signature	Name and Title Cisse W. Spragins, PhD., CEO	Date 1/5/11

EPA Form 8570-35 (12-2009) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.

EPA

United States
Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address	EPA File Symbol/Registration Number
Rockwell Labs Ltd 1512 Taney St. North Kansas City, MO 64116	73079-xx
	Product Name SiliCide(TM)
	Date of Confidential Statement of Formula *(EPA Form 8570-4)* 01/05/2011

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Silica Gel

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☑ (A) An accurate Confidential Statement of Formula *(EPA FORM 8570-4)* for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient	Product Name	Registration Number
Silica Gel	[redacted]	[redacted]

Signature	Name and Title	Date
	Cisse W. Spragins, Ph.D., CEO	01/05/2011

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 – EPA
Copy 2 - Applicant copy

DATA EVALUATION RECORD

[Primary Reviewer's Name]

STUDY TYPE:	PRODUCT PERFORMANCE [No guideline No.]
MRID:	**483474-01; McCoy, T.C., Silica Dust Formulation Efficacy for Control of Bed Bugs (*Cimex lectularius*), September 10, 2010.**
DP BARCODE:	**387010**
DECISION NO:	**444104**
SUBMISSION NO:	888576
SPONSOR:	Rockwell Labs Ltd., 1512 Taney St., North Kansas City, MO, 64116
TESTING FACILITY:	Department of Entomology, Virginia Tech, Blacksburg, VA, 24061
STUDY DIRECTOR:	Dini M. Miller, Ph.D.
SUBMITTER:	Cisse Spragins, Ph.D., Rockwell Labs Ltd., 1512 Taney St., North Kansas City, MO, 64116
STUDY COMPLETED:	10/09/2010
CONFIDENTIALITY CLAIMS:	None
GOOD LABORATORY PRACTICE:	Not conducted according to GLP 40 CFR Part 160 EPA (FIFRA)
TEST MATERIAL:	PRODUCT NAME: SiliCide™ EPA REGISTRATION NUMBER OR FILE SYMBOL: 73079-RE ACTIVE INGREDIENT NAME: Amorphous Silica Gel CHEMICAL NAME: Silicon dioxide A.I. %: 100 PC CODE: 072605 CAS NO.: 7631-86-9 FORMULATION TYPE: Dust PRODUCT APPLICATION RATES g/m^2: 2 oz/100 ft^2 (6.1 g/m^2, reviewer calculated); 1 lb/1000 ft^2 (4.9 g/m^2, reviewer calculated)

ACTIVE INGREDIENT APPLICATION RATE(S)g/m^2:
same as product

PROPOSED LABEL MARKETING CLAIMS: Bed Bugs

EPA REQUESTS:

[EPA WILL ADD DIRECTIVES HERE]

STUDY REVIEW

Study Number/Title: (if more than one study is provided in the MRID)

Purpose: To test the efficacy of silica dust against bed bug adults, nymphs, and eggs.

MATERIALS AND METHODS

Test Location: Dodson Urban Pest Management Laboratory at Virginia Tech University, Blacksburg, VA.

Test Material(s): The test material was amorphous silica gel applied at the label rate of 2 oz/100 ft^2 and 2 oz/1000 ft^2 (The 2 oz/ 1000 ft^2 rate was not listed on the label and may be a typographical error.) The reviewer does not know if the material is the same as the EPA product or file symbol.

Test Species Name, Life Stage, Sex and Age: Adult, nymphs (3-5th instars), and eggs of Epic Center strain bed bugs (*Cimex lectularius*).

Describe test containers, chambers and/or apparatus (include site description and location) and how experiment was conducted:

Petri dishes (9.5 cm dia.) containing either adult or nymphs were inverted onto hardwood panels which had been pre dusted with the test material (2 oz/100 ft^2). The eggs were deposited on filter paper discs (4.25 cm dia.) and then dusted with silica dust at 2 oz/1000 ft^2 (This application rate is not mentioned on the label, but this value may actually be 1 lb/1000 ft^2 which is on the label). The adults and nymphs were evaluated for mortality at 1, 2, 4, 5, 6, 8, 10, 12, and 15 hours following continuous exposure. After the eggs were dusted by brush with silica dust, observations of hatching and mortality after hatching were observed for 8 days.

List the treatments including untreated control (express application rate as g/m^2): For tests on adults and nymphs, the text on page 5 indicates that control tests were conducted but the results were not given. Control results were given in a figure for hatching of untreated eggs. The application rate was 6.1 g/m^2 for adults and nymphs and 0.6 g/m^2 for eggs if this indeed was the actual exposure (see above paragraph).

Number of replicates per treatment: four

Number of individuals per replicate: 10 adults and 10 nymphs; groups of bed bug eggs

Length of exposure to treatment (time in seconds, minutes or hours): Continuous exposure for 15 hours in tests with adults and nymphs and 8 days of continuous for eggs and nymphs that hatched.

Experimental conditions (state relative humidity, temperature, and photoperiod): Not given for test environments, but while being reared for testing, rearing jars kept at 27°C, 55 % RH, and 12:12 photoperiod.

State data or endpoints that were to be collected/recorded: Mortality for adults and nymphs and hatchability for eggs followed by mortality for nymphs that hatched.

Were the data analyzed? If so, what statistical analyses were performed?

Yes, the adult and nymphal assays were analyzed using a Probit analysis. The egg data were described based on % hatch and % mortality. The untreated control in the egg assay had 0% mortality. As mentioned earlier, no comparisons with control test were presented for Petri dish testing of adults and nymphs although the text in the study report says that control tests were performed.

RESULTS

Tables 1 and 2 show the LT_{50} and LT_{90} values respectively for adult and nymphs. For adults, 100 % mortality was achieved by 15 hours and for nymphs, by 10 hours. Treatment did not have any effect on egg hatchability (at day 8, 97 % hatched compared to control value of 99 %), but did cause 68 % mortality by day 4 and 100 % by day 8 of the nymphs that hatched. Raw data were presented with the exception of the control data for the Petri dish experiments preventing the use of Abbott's formula. However the control data presented with the egg test does show the expected results.

Table 1. Comparison of LT_{50} values calculated for pyrethroid resistant bed bugs (Epic center strain) confined on hardboard panels dusted with silica dust (9.5 cm dia treatment area) at the rate of 2oz/100 sq. ft. (n = 4 replicates).

Treatment	N	LT_{50} (hours)	95% CIs	Slope ± SE
Adults	40	9.3a	8.6 – 10.2	0.32 ± 0.3
Nymphs	40	4.3b	3.8 – 4.8	0.43 ± 0.05

Values followed by the same letter are not significantly different at p=0.05

Table 2. Comparison of LT_{90} values calculated for pyrethroid resistant bed bugs (Epic center strain) confined on hardboard panels dusted with silica dust (9.5 cm dia treatment area) at the rate of 2oz/100 sq. ft. (n = 4 replicates).

Treatment	N	LT_{90} (hours)	95% CIs	Slope ± SE
Adults	40	13.3a	12.2 – 15.1	0.32 ± 0.3
Nymphs	40	7.3b	6.6 – 8.2	0.43 ± 0.05

Values followed by the same letter are not significantly different at p=0.05

Study Authors Conclusions

No conclusions were presented, but the data support the submitter's addition of bed bugs to the label.

Reviewers Conclusions

Control mortality data were not available for the Petri dish experiments, but the mortality from the egg hatchability study was 0%..

Reviewer Recommendations

The study is acceptable, but (1) the untreated control data should have been provided for the Petri dish experiments and (2) clarification should be provided regarding the label application rates versus the test application rates. The rate of 2 oz/1000 ft^2 used in the egg hatchability test is not mentioned on the label and could be a typographical error. Also, the label should provide more details when and on what pests the different application rates apply.